

Facility ID: 1677011093 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 R001](#)
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Facility ID: 1677011093 Emissions Unit ID: R001 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, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by a waterwash	OAC rule 3745-31-05 (PTI 16-1936)	5.07 pounds of OCs per hour and, on any day when photochemically reactive materials are used, 40 pounds of OCs per day from coatings (as applied after any final thinning) and cleanup/purge materials
[Note: OC(s) = organic compound(s); HAP(s) = hazardous air pollutant(s); photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]	OAC rule 3745-35-07 (PTI 16-1936)	Facility-wide OC emissions shall not exceed 99.0 tons per year as a rolling 12-month summation. Facility-wide individual HAP emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07	Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation. The mass emission limitations under OAC rule 3745-21-07 are less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05.

2. **Additional Terms and Conditions**
 - (a) The hourly OC emission limit specified pursuant to OAC rule 3745-31-05 is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s). The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)
 TLV (ug/m3): 590,000
 Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5
 Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900
 MAGLC (ug/m3): 14,000

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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- ii. 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
- iii. 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall properly employ and maintain a spray booth waterwash control system to catch paint overspray. The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLV) paint system to increase solids transfer efficiency.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds of OCs/gallon of respective coating and cleanup/purge material.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds of OCs/day, i.e., the sum of [b x c], respectively, for all coatings and cleanup/purge materials used.
3. The permittee shall collect and record monthly the following facility-wide information (from all emissions units at the facility) to determine the facility-wide emissions of OCs, each individual HAP, and combined HAPs:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds of OCs/gallon of respective coating or cleanup/purge material.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds of individual HAP/gallon of respective coating or cleanup/purge material.
 - e. The combined HAPs content of each coating and cleanup/purge material, in pounds of combined HAPs/gallon of respective coating or cleanup/purge material.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - g. The total individual HAP emissions for each individual HAP from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x d)/2000], respectively, for all coatings and cleanup/purge materials employed.

h. The total combined HAPs emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x e)/2000], respectively, for all coatings and cleanup/purge materials employed.

i. Summation of previous 12 calendar months of monthly OC emissions, in tons/year; summation of previous 12 calendar months of monthly individual HAP emissions for each individual HAP, in tons/year; and summation of previous 12 calendar months of monthly combined HAPs emissions, in tons/year.

4. The permittee shall collect, record, and retain the following information when conducting evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics Policy:"
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
 - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
- Identification of each day when photochemically reactive materials were used during which the OC emissions from the coatings and cleanup/purge materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - Identification of each rolling 12-month summation of facility-wide OC emissions that exceeded the maximum allowable annual facility-wide emissions of OC.
 - Identification of each rolling 12-month summation of facility-wide individual HAP emissions that exceeded the maximum allowable annual facility-wide emissions of individual HAPs.
 - Identification of each rolling 12-month summation of facility-wide combined HAPs emissions that exceeded the maximum allowable annual facility-wide emissions of combined HAPs.

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: 5.07 pounds of OCs/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit, as demonstrated below:

$$PTE[OCs]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

PTE[OCs]_h = 5.07 pounds of OCs/hour [hourly potential to emit OCs];
CLC_{max} = 47 frames/hour [maximum coating line capacity];
OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered]; and
CMD = 6.71 pounds of OCs/gallon of cleanup/purge material [density of cleanup/purge material].
Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
Emission Limitations: Maximum allowable annual facility-wide emissions of OCs, each individual HAP, and combined HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.

F. Miscellaneous Requirements

1. None

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Facility ID: 1677011093 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by a waterwash	OAC rule 3745-31-05 (PTI 16-1936)	5.07 pounds of OCs per hour and, on any day when photochemically reactive materials are used, 40 pounds of OCs per day from coatings (as applied after any final thinning) and cleanup/purge materials
[Note: OC(s) = organic compound(s); HAP(s) = hazardous air pollutant(s); photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]		
	OAC rule 3745-35-07 (PTI 16-1936)	Facility-wide OC emissions shall not exceed 99.0 tons per year as a rolling 12-month summation.
		Facility-wide individual HAP emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
		Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07	The mass emission limitations under OAC rule 3745-21-07 are less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The hourly OC emission limit specified pursuant to OAC rule 3745-31-05 is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).
The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)
TLV (ug/m3): 590,000
Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5
Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900
MAGLC (ug/m3): 14,000
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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:
 - i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
 - ii. 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
 - iii. 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall properly employ and maintain a spray booth waterwash control system to catch paint overspray. The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLV) paint system to increase solids transfer efficiency.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds of OCs/gallon of respective coating and cleanup/purge material.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds of OCs/day, i.e., the sum of [b x c], respectively, for all coatings and cleanup/purge materials used.
3. The permittee shall collect and record monthly the following facility-wide information (from all emissions units at the facility) to determine the facility-wide emissions of OCs, each individual HAP, and combined HAPs:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds of OCs/gallon of respective coating or cleanup/purge material.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds of individual HAP/gallon of respective coating or cleanup/purge material.
 - e. The combined HAPs content of each coating and cleanup/purge material, in pounds of combined HAPs/gallon of respective coating or cleanup/purge material.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - g. The total individual HAP emissions for each individual HAP from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x d)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - h. The total combined HAPs emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x e)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - i. Summation of previous 12 calendar months of monthly OC emissions, in tons/year; summation of previous 12 calendar months of monthly individual HAP emissions for each individual HAP, in tons/year; and summation of previous 12 calendar months of monthly combined HAPs emissions, in tons/year.
4. The permittee shall collect, record, and retain the following information when conducting evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. Identification of each day when photochemically reactive materials were used during which the OC emissions from the coatings and cleanup/purge materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Identification of each rolling 12-month summation of facility-wide OC emissions that exceeded the maximum allowable annual facility-wide emissions of OC.
 - c. Identification of each rolling 12-month summation of facility-wide individual HAP emissions that exceeded the

maximum allowable annual facility-wide emissions of individual HAPs.

d. Identification of each rolling 12-month summation of facility-wide combined HAPs emissions that exceeded the maximum allowable annual facility-wide emissions of combined HAPs.

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: 5.07 pounds of OCs/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit, as demonstrated below:

$$PTE[OCs]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

PTE[OCs]_h = 5.07 pounds of OCs/hour [hourly potential to emit OCs];
 CLC_{max} = 47 frames/hour [maximum coating line capacity];
 OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
 OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
 CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered]; and
 CMD = 6.71 pounds of OCs/gallon of cleanup/purge material [density of cleanup/purge material].
 Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
 Emission Limitations: Maximum allowable annual facility-wide emissions of OCs, each individual HAP, and combined HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.

F. Miscellaneous Requirements

1. None

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Facility ID: 1677011093 Emissions Unit ID: R003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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.
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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, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by a waterwash	OAC rule 3745-31-05 (PTI 16-1936)	5.07 pounds of OCs per hour and, on any day when photochemically reactive materials are used, 40 pounds of OCs per day from coatings (as applied after any final thinning) and cleanup/purge materials

[Note:
 OC(s) = organic compound(s);
 HAP(s) = hazardous air pollutant(s);
 photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]

OAC rule 3745-35-07 (PTI 16-1936)

Facility-wide OC emissions shall not exceed 99.0 tons per year as a rolling 12-month summation.

Facility-wide individual HAP emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.

Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.

OAC rule 3745-21-07

The mass emission limitations under OAC rule 3745-21-07 are less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The hourly OC emission limit specified pursuant to OAC rule 3745-31-05 is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s). The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m3): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900

MAGLC (ug/m3): 14,000

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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- ii. 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
- iii. 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall properly employ and maintain a spray booth waterwash control system to catch paint overspray. The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLV) paint system to increase solids transfer efficiency.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds of OCs/gallon of respective coating and cleanup/purge material.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds of OCs/day, i.e., the sum

of [b x c], respectively, for all coatings and cleanup/purge materials used.

3. The permittee shall collect and record monthly the following facility-wide information (from all emissions units at the facility) to determine the facility-wide emissions of OCs, each individual HAP, and combined HAPs:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds of OCs/gallon of respective coating or cleanup/purge material.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds of individual HAP/gallon of respective coating or cleanup/purge material.
 - e. The combined HAPs content of each coating and cleanup/purge material, in pounds of combined HAPs/gallon of respective coating or cleanup/purge material.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - g. The total individual HAP emissions for each individual HAP from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x d)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - h. The total combined HAPs emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x e)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - i. Summation of previous 12 calendar months of monthly OC emissions, in tons/year; summation of previous 12 calendar months of monthly individual HAP emissions for each individual HAP, in tons/year; and summation of previous 12 calendar months of monthly combined HAPs emissions, in tons/year.
4. The permittee shall collect, record, and retain the following information when conducting evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. Identification of each day when photochemically reactive materials were used during which the OC emissions from the coatings and cleanup/purge materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Identification of each rolling 12-month summation of facility-wide OC emissions that exceeded the maximum allowable annual facility-wide emissions of OC.
 - c. Identification of each rolling 12-month summation of facility-wide individual HAP emissions that exceeded the maximum allowable annual facility-wide emissions of individual HAPs.
 - d. Identification of each rolling 12-month summation of facility-wide combined HAPs emissions that exceeded the maximum allowable annual facility-wide emissions of combined HAPs.

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: 5.07 pounds of OCs/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit, as demonstrated below:

$$PTE[OCs]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

PTE[OCs]_h = 5.07 pounds of OCs/hour [hourly potential to emit OCs];
 CLC_{max} = 47 frames/hour [maximum coating line capacity];
 OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
 OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
 CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered]; and
 CMD = 6.71 pounds of OCs/gallon of cleanup/purge material [density of cleanup/purge material].
 Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
 Emission Limitations: Maximum allowable annual facility-wide emissions of OCs, each individual HAP, and combined HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.

F. Miscellaneous Requirements

- 1. None

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

Facility ID: 1677011093 Emissions Unit ID: R004 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, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by a waterwash	OAC rule 3745-31-05 (PTI 16-1936)	5.07 pounds of OCs per hour and, on any day when photochemically reactive materials are used, 40 pounds of OCs per day from coatings (as applied after any final thinning) and cleanup/purge materials
[Note: OC(s) = organic compound(s); HAP(s) = hazardous air pollutant(s); photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]	OAC rule 3745-35-07 (PTI 16-1936)	Facility-wide OC emissions shall not exceed 99.0 tons per year as a rolling 12-month summation. Facility-wide individual HAP emissions shall not exceed 9.9 tons per year as a rolling 12-month summation. Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07	The mass emission limitations under OAC rule 3745-21-07 are less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The hourly OC emission limit specified pursuant to OAC rule 3745-31-05 is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s). The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m3): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900

MAGLC (ug/m3): 14,000

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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- ii. 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
- iii. 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall properly employ and maintain a spray booth waterwash control system to catch paint overspray. The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLV) paint system to increase solids transfer efficiency.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds of OCs/gallon of respective coating and cleanup/purge material.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds of OCs/day, i.e., the sum of [b x c], respectively, for all coatings and cleanup/purge materials used.
3. The permittee shall collect and record monthly the following facility-wide information (from all emissions units at the facility) to determine the facility-wide emissions of OCs, each individual HAP, and combined HAPs:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds of OCs/gallon of respective coating or cleanup/purge material.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds of individual HAP/gallon of respective coating or cleanup/purge material.
 - e. The combined HAPs content of each coating and cleanup/purge material, in pounds of combined HAPs/gallon of respective coating or cleanup/purge material.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - g. The total individual HAP emissions for each individual HAP from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x d)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - h. The total combined HAPs emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x e)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - i. Summation of previous 12 calendar months of monthly OC emissions, in tons/year; summation of previous 12 calendar months of monthly individual HAP emissions for each individual HAP, in tons/year; and summation of previous 12 calendar months of monthly combined HAPs emissions, in tons/year.

4. The permittee shall collect, record, and retain the following information when conducting evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. Identification of each day when photochemically reactive materials were used during which the OC emissions from the coatings and cleanup/purge materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Identification of each rolling 12-month summation of facility-wide OC emissions that exceeded the maximum allowable annual facility-wide emissions of OC.
 - c. Identification of each rolling 12-month summation of facility-wide individual HAP emissions that exceeded the maximum allowable annual facility-wide emissions of individual HAPs.
 - d. Identification of each rolling 12-month summation of facility-wide combined HAPs emissions that exceeded the maximum allowable annual facility-wide emissions of combined HAPs.

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: 5.07 pounds of OCs/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit, as demonstrated below:

$$PTE[OCs]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

PTE[OCs]_h = 5.07 pounds of OCs/hour [hourly potential to emit OCs];
 CLC_{max} = 47 frames/hour [maximum coating line capacity];
 OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
 OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
 CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered]; and
 CMD = 6.71 pounds of OCs/gallon of cleanup/purge material [density of cleanup/purge material].
 Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
 Emission Limitations: Maximum allowable annual facility-wide emissions of OCs, each individual HAP, and combined HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.

F. Miscellaneous Requirements

1. None

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Facility ID: 1677011093 Emissions Unit ID: R005 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

- 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, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by a waterwash	OAC rule 3745-31-05 (PTI 16-1936)	5.07 pounds of OCs per hour and, on any day when photochemically reactive materials are used, 40 pounds of OCs per day from coatings (as applied after any final thinning) and cleanup/purge materials

[Note:
 OC(s) = organic compound(s);
 HAP(s) = hazardous air pollutant(s);
 photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]

OAC rule 3745-35-07 (PTI 16-1936)	Facility-wide OC emissions shall not exceed 99.0 tons per year as a rolling 12-month summation.
	Facility-wide individual HAP emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
	Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
OAC rule 3745-21-07	The mass emission limitations under OAC rule 3745-21-07 are less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- The hourly OC emission limit specified pursuant to OAC rule 3745-31-05 is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).
 The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)
 TLV (ug/m3): 590,000
 Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5
 Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900
 MAGLC (ug/m3): 14,000

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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- 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
- 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall properly employ and maintain a spray booth waterwash control system to catch paint overspray.

The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLV) paint system to increase solids transfer efficiency.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds of OCs/gallon of respective coating and cleanup/purge material.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds of OCs/day, i.e., the sum of [b x c], respectively, for all coatings and cleanup/purge materials used.
3. The permittee shall collect and record monthly the following facility-wide information (from all emissions units at the facility) to determine the facility-wide emissions of OCs, each individual HAP, and combined HAPs:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds of OCs/gallon of respective coating or cleanup/purge material.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds of individual HAP/gallon of respective coating or cleanup/purge material.
 - e. The combined HAPs content of each coating and cleanup/purge material, in pounds of combined HAPs/gallon of respective coating or cleanup/purge material.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - g. The total individual HAP emissions for each individual HAP from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x d)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - h. The total combined HAPs emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x e)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - i. Summation of previous 12 calendar months of monthly OC emissions, in tons/year; summation of previous 12 calendar months of monthly individual HAP emissions for each individual HAP, in tons/year; and summation of previous 12 calendar months of monthly combined HAPs emissions, in tons/year.
4. The permittee shall collect, record, and retain the following information when conducting evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. Identification of each day when photochemically reactive materials were used during which the OC emissions from the coatings and cleanup/purge materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Identification of each rolling 12-month summation of facility-wide OC emissions that exceeded the maximum allowable annual facility-wide emissions of OC.
 - c. Identification of each rolling 12-month summation of facility-wide individual HAP emissions that exceeded the maximum allowable annual facility-wide emissions of individual HAPs.
 - d. Identification of each rolling 12-month summation of facility-wide combined HAPs emissions that exceeded the maximum allowable annual facility-wide emissions of combined HAPs.

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: 5.07 pounds of OCs/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit, as demonstrated below:

$$PTE[OCs]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

PTE[OCs]_h = 5.07 pounds of OCs/hour [hourly potential to emit OCs];
CLC_{max} = 47 frames/hour [maximum coating line capacity];
OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered]; and
CMD = 6.71 pounds of OCs/gallon of cleanup/purge material [density of cleanup/purge material].
Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
Emission Limitations: Maximum allowable annual facility-wide emissions of OCs, each individual HAP, and combined HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.

F. Miscellaneous Requirements

1. None

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Facility ID: 1677011093 Emissions Unit ID: R006 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, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by a waterwash	OAC rule 3745-31-05 (PTI 16-1936)	5.07 pounds of OCs per hour and, on any day when photochemically reactive materials are used, 40 pounds of OCs per day from coatings (as applied after any final thinning) and cleanup/purge materials
[Note: OC(s) = organic compound(s); HAP(s) = hazardous air pollutant(s); photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]	OAC rule 3745-35-07 (PTI 16-1936)	Facility-wide OC emissions shall not exceed 99.0 tons per year as a rolling 12-month summation. Facility-wide individual HAP emissions shall not exceed 9.9 tons per year as a rolling 12-month summation. Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.

OAC rule 3745-21-07

The mass emission limitations under OAC rule 3745-21-07 are less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The hourly OC emission limit specified pursuant to OAC rule 3745-31-05 is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s). The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m3): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900

MAGLC (ug/m3): 14,000

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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- ii. 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
- iii. 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall properly employ and maintain a spray booth waterwash control system to catch paint overspray. The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLV) paint system to increase solids transfer efficiency.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds of OCs/gallon of respective coating and cleanup/purge material.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds of OCs/day, i.e., the sum of [b x c], respectively, for all coatings and cleanup/purge materials used.
3. The permittee shall collect and record monthly the following facility-wide information (from all emissions units at the facility) to determine the facility-wide emissions of OCs, each individual HAP, and combined HAPs:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.

- c. The OC content of each coating and cleanup/purge material, in pounds of OCs/gallon of respective coating or cleanup/purge material.
- d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds of individual HAP/gallon of respective coating or cleanup/purge material.
- e. The combined HAPs content of each coating and cleanup/purge material, in pounds of combined HAPs/gallon of respective coating or cleanup/purge material.
- f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000], respectively, for all coatings and cleanup/purge materials employed.
- g. The total individual HAP emissions for each individual HAP from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x d)/2000], respectively, for all coatings and cleanup/purge materials employed.
- h. The total combined HAPs emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x e)/2000], respectively, for all coatings and cleanup/purge materials employed.
- i. Summation of previous 12 calendar months of monthly OC emissions, in tons/year; summation of previous 12 calendar months of monthly individual HAP emissions for each individual HAP, in tons/year; and summation of previous 12 calendar months of monthly combined HAPs emissions, in tons/year.
4. The permittee shall collect, record, and retain the following information when conducting evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics Policy":
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
 - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.
- D. Reporting Requirements**
- In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - Identification of each day when photochemically reactive materials were used during which the OC emissions from the coatings and cleanup/purge materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - Identification of each rolling 12-month summation of facility-wide OC emissions that exceeded the maximum allowable annual facility-wide emissions of OC.
 - Identification of each rolling 12-month summation of facility-wide individual HAP emissions that exceeded the maximum allowable annual facility-wide emissions of individual HAPs.
 - Identification of each rolling 12-month summation of facility-wide combined HAPs emissions that exceeded the maximum allowable annual facility-wide emissions of combined HAPs.
- E. Testing Requirements**
- 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: 5.07 pounds of OCs/hour
- Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit, as demonstrated below:
- $$PTE[OCs]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$
- Where:
- PTE[OCs]_h = 5.07 pounds of OCs/hour [hourly potential to emit OCs];
 CLC_{max} = 47 frames/hour [maximum coating line capacity];
 OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
 OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
 CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered]; and
 CMD = 6.71 pounds of OCs/gallon of cleanup/purge material [density of cleanup/purge material].
 Emission Limitation: 40 pounds of OC/day
- Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
 Emission Limitations: Maximum allowable annual facility-wide emissions of OCs, each individual HAP, and combined HAPs
- Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
- F. Miscellaneous Requirements**
- None

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Facility ID: 1677011093 Emissions Unit ID: R007 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, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by exhaust fan filter elements	OAC rule 3745-31-05 (PTI 16-1936)	5.07 pounds of OCs per hour and, on any day when photochemically reactive materials are used, 40 pounds of OCs per day from coatings (as applied after any final thinning) and cleanup/purge materials
[Note: OC(s) = organic compound(s); HAP(s) = hazardous air pollutant(s); photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]	OAC rule 3745-35-07 (PTI 16-1936)	Facility-wide OC emissions shall not exceed 99.0 tons per year as a rolling 12-month summation. Facility-wide individual HAP emissions shall not exceed 9.9 tons per year as a rolling 12-month summation. Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07	The mass emission limitations under OAC rule 3745-21-07 are less stringent than the mass emission limitations established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The hourly OC emission limit specified pursuant to OAC rule 3745-31-05 is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).
The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

 Pollutant: MEK (CAS 78-93-3)
 TLV (ug/m3): 590,000
 Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5
 Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900
 MAGLC (ug/m3): 14,000
 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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- ii. 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
- iii. 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall properly employ and maintain a spray booth waterwash control system to catch paint overspray. The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLV) paint system to increase solids transfer efficiency.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds of OCs/gallon of respective coating and cleanup/purge material.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds of OCs/day, i.e., the sum of [b x c], respectively, for all coatings and cleanup/purge materials used.
3. The permittee shall collect and record monthly the following facility-wide information (from all emissions units at the facility) to determine the facility-wide emissions of OCs, each individual HAP, and combined HAPs:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds of OCs/gallon of respective coating or cleanup/purge material.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds of individual HAP/gallon of respective coating or cleanup/purge material.
 - e. The combined HAPs content of each coating and cleanup/purge material, in pounds of combined HAPs/gallon of respective coating or cleanup/purge material.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - g. The total individual HAP emissions for each individual HAP from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x d)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - h. The total combined HAPs emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x e)/2000], respectively, for all coatings and cleanup/purge materials employed.
 - i. Summation of previous 12 calendar months of monthly OC emissions, in tons/year; summation of previous 12 calendar months of monthly individual HAP emissions for each individual HAP, in tons/year; and summation of previous 12 calendar months of monthly combined HAPs emissions, in tons/year.
4. The permittee shall collect, record, and retain the following information when conducting evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics 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

Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. Identification of each day when photochemically reactive materials were used during which the OC emissions from the coatings and cleanup/purge materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - b. Identification of each rolling 12-month summation of facility-wide OC emissions that exceeded the maximum allowable annual facility-wide emissions of OC.
 - c. Identification of each rolling 12-month summation of facility-wide individual HAP emissions that exceeded the maximum allowable annual facility-wide emissions of individual HAPs.
 - d. Identification of each rolling 12-month summation of facility-wide combined HAPs emissions that exceeded the maximum allowable annual facility-wide emissions of combined HAPs.

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: 5.07 pounds of OCs/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit, as demonstrated below:

$$PTE[OCs]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

PTE[OCs]_h = 5.07 pounds of OCs/hour [hourly potential to emit OCs];
 CLC_{max} = 47 frames/hour [maximum coating line capacity];
 OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
 OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
 CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered]; and
 CMD = 6.71 pounds of OCs/gallon of cleanup/purge material [density of cleanup/purge material].
 Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.
 Emission Limitations: Maximum allowable annual facility-wide emissions of OCs, each individual HAP, and combined HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section C.

F. Miscellaneous Requirements

1. None

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

Facility ID: 1677011093 Emissions Unit ID: R010 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.

Applicable Emissions Limitations/Control

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Measures
paint spray booth, coating miscellaneous plastic parts, with hot-air (0-125 degrees Fahrenheit) drying oven, overspray controlled by exhaust fan filter elements	OAC rule 3745-31-05 (PTI 16-02061)	1.9 pounds/hour and 8.3 tons/year of OCs [See sections A.2 and B.1 through B.3 below for additional requirements of OAC rule 3745-31-05.]
[Note: OC(s) = organic compound(s); HAP(s) = hazardous air pollutant(s); photochemically reactive material is defined per OAC rule 3745-21-01(C)(5); and all OCs and HAPs used are assumed to be emitted.]	OAC rule 3745-21-07(G)	exempt pursuant to OAC rule 3745-21-07(G)(9) [See section B.3 below.]

2. Additional Terms and Conditions

- (a) The above OC emission limits (specified pursuant to OAC rule 3745-31-05) are based on the potentials to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, nor emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with compound formulations, maximum coating application rate capacity, cleanup materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).

The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-butoxyethanol (CAS 111-76-2)
TLV (ug/m3): 96,800
Maximum Hourly Emission Rate (lbs/hr): 0.61
Predicted 1-Hour Maximum Ground-Level Concentration at 38 m (ug/m3): 57
MAGLC (ug/m3): 2305

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 Toxics 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- ii. 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
- iii. 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.).

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

B. Operational Restrictions

1. The waterwash control system shall be employed at all times the emissions unit is in operation.
2. All coatings and cleanup solvents shall be properly identified and held in closed containers or storage vessels at all times when not in use.
3. The permittee shall not use any photochemically reactive materials in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification of each liquid organic material, including cleanup material, employed in this emissions unit; and
 - b. whether or not each liquid organic material, including cleanup material, employed is a photochemically reactive material.
2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above in section A.2, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted during each such day, in pounds.
2. The 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 in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitations: 1.9 pounds/hour, and 8.3 tons/year of OCs

Applicable Compliance Method: The OC emission limitations are based upon the emission unit's potential to emit, as follows:

$$\text{PTE[OCs]}_h = (\text{CARCmax}) \times (\text{OCCmax}) + (\text{CMmax}) \times (\text{D}); \text{ and}$$
$$\text{PTE[OCs]}_y = (\text{PTE[OCs]}_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}).$$

Where:

$\text{PTE[OCs]}_h = 1.9$ pounds of OCs/hour [hourly potential to emit OCs];
 $\text{PTE[OCs]}_y = 8.3$ tons of OCs/year [yearly potential to emit OCs];
 $\text{CARCmax} = 0.88$ gallon of coating/hour [maximum coating application rate capacity, coatings as applied after final thinning];
 $\text{OCCmax} = 1.89$ pounds of OCs/gallon of coating [maximum OC content of coatings as applied after final thinning];
 $\text{CMmax} = 0.0288$ gallon of cleanup material/hour [maximum average hourly usage rate based on 106 gallons used on an operating schedule of 3675 hours/year; and
 $\text{D} = 6.71$ pounds of OCs/gallon of cleanup material [density of cleanup material solvent].

F. Miscellaneous Requirements

1. This emissions unit shall be included with all other emissions units at the facility when determining compliance with the facility-wide emission limitations of OCs and HAPs, as established in permit-to-install (PTI) #16-1936, as issued December 15, 1999.