

Facility ID: 1677011125 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.

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Facility ID: 1677011125 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Paint booth with particulate filters - miscellaneous metal parts coating line.	OAC rule 3745-31-05(A)(3) (PTI 16-02062)	1.77 pounds of volatile organic compounds (VOC) per hour for coatings and cleanup materials 7.8 tons of VOC per year for coatings and cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d). 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

OAC rule 3745-21-09(U)(1)(d)

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating, in pounds per gallon, (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating and cleanup material employed;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month (i.e., the sum of (b) times (c) for each coating plus the sum of (b) times (c) for each cleanup material);
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
3. The permit to install for this emissions unit (K001) 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 Toxic 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-butoxy ethanol

TLV (mg/m3): 97
 Maximum Hourly Emission Rate (lbs/hr): 1.77
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 187.0
 MAGLC (ug/m3): 2309.5

Pollutant: 2-butanol

TLV (mg/m3): 303
 Maximum Hourly Emission Rate (lbs/hr): 1.77
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 187.0
 MAGLC (ug/m3): 7214.3

Pollutant: 2-propanol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 1.77
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 187.0
 MAGLC (ug/m3): 23,404.8

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (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;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(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 collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly VOC emissions from the coatings and cleanup materials exceeded 1.77 pounds per hour, and the actual average hourly VOC emissions for each such month.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 Emission Limitation

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
Emission Limitations

1.77 pounds of VOC per hour for coatings and cleanup materials

7.75 tons of VOC per year for coatings and cleanup materials

Applicable Compliance Method

Compliance with the emission limitations shall be determined through record keeping of the coating and cleanup material usage, VOC content of each coating and cleanup material, and operating hours per month as required in section C.2. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677011125 Emissions Unit ID: K002 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>
K002 - Possis varnish oven PT1-25 XHD - miscellaneous metal parts coating line #1.	OAC rule 3745-31-05(A)(3) (PTI 16-02062)	0.94 pound of volatile organic compounds (VOC) per hour 4.1 tons of VOC per year The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1) (a). 4.3 pounds VOC per gallon of coating, excluding water and exempt solvents, for a clear coating
	OAC rule 3745-21-09(U)(1)(a)	

- 2. **Additional Terms and Conditions**
 - (a) None

B. **Operational Restrictions**

- 1. None

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating, in pounds per gallon, (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating and cleanup material employed;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month (i.e., the sum of (b) times (c) for each coating plus the sum of (b) times (c) for each cleanup material);
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

3. The permit to install for this emissions unit (K002) 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 Toxic 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: styrene

TLV (mg/m3): 85
 Maximum Hourly Emission Rate (lbs/hr): 1.88*
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 154.9
 MAGLC (ug/m3): 2023.8

*The maximum hourly emission rate is the combined emission rates from emissions units K002 and K003.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (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;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(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 collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly VOC emissions from the coatings and cleanup materials exceeded 0.94 pound per hour, and the actual average hourly VOC emissions for each such month.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2 of this permit.
- E. Testing Requirements**
1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation

4.3 pounds VOC per gallon of coating, excluding water and exempt solvents, for a clear coating.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section C.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
Emission Limitations

0.94 pound of VOC per hour

4.1 tons of VOC per year

Applicable Compliance Method

Compliance with the emission limitations shall be determined through record keeping of the coating and cleanup material usage, VOC content of each coating and cleanup material, and operating hours per month as required in section C.2. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.
- F. Miscellaneous Requirements**
1. None