Facility ID: 1677011135 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 K001
Go to Part II for Emissions Unit K002
Go to Part II for Emissions Unit P901

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Facility ID: 1677011135 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Spray booth #1	OAC rule 3745-31-05(A)(3) (PTI 16-02210)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U). 20.2 lbs per day volatile organic compounds (VOC) 3.69 tpy VOC See section B.1 below. exempt (see sections B.2 and B.3 below)
	OAC rule 3745-21-09(U)	

2. **Additional Terms and Conditions**

   (a) None

B. **Operational Restrictions**

1. The permittee shall operate and maintain paint filters to control overspray, while the emissions unit is in operation. The filters shall be maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), and any modifications deemed necessary by the permittee.

2. The emissions unit shall only be used for the repainting (refinishing) of used motor vehicles and trailers.

3. The permittee shall repaint or refinish fewer than thirty-five (35) motor vehicles per day.

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

1. The permittee shall collect and record the following information for each day for the coating operation:

   a. the number of motor vehicles repainted or refinished;

   b. the company identification for each coating and cleanup material employed;

   c. the number of gallons of each coating and cleanup material employed;

   d. the VOC content of each coating and cleanup material, in pounds per gallon; and

   e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day.

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. 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: methyl ethyl ketone

TLV (mg/m3): 599
Maximum Hourly Emission Rate (lbs/hr): 1.68 (combined K001 and K002)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 500.7
MAGLC (ug/m3): 14,262

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 1.68 (combined K001 and K002)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 500.7
MAGLC (ug/m3): 4,476

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 1.68 (combined K001 and K002)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 500.7
MAGLC (ug/m3): 4,881

3. 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.

4. 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 submit deviation (excursion) reports which include an identification of each day during which the total organic compound emissions exceeded 20.2 pounds per day, and the actual organic compound emissions for each such day.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2 of this permit.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. **Testing Requirements**

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

20.2 lbs per day volatile organic compounds (VOC)
3.69 tpy VOC

Applicable Compliance Method

Compliance with the daily emission limitation shall be determined by the record keeping requirements of section C.1 of these T&Cs. Compliance with the annual emission limitation shall be determined by multiplying the daily emission rate by the actual number of days the emissions unit was in operation and dividing by 2000 lbs/ton.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 1677011135 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Spray booth #2	OAC rule 3745-31-05(A)(3) (PTI 16-02210)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U). 20.2 lbs per day volatile organic compounds (VOC) 3.69 tpy VOC See section B.1 below. exempt (see sections B.2 and B.3 below)
	OAC rule 3745-21-09(U)	

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The permittee shall operate and maintain paint filters to control overspray, while the emissions unit is in operation. The filters shall be maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), and any modifications deemed necessary by the permittee.

2. The emissions unit shall only be used for the repainting (refinishing) of used motor vehicles and trailers.

3. The permittee shall repaint or refinish fewer than thirty-five (35) motor vehicles per day.

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

1. The permittee shall collect and record the following information for each day for the coating operation:

a. the number of motor vehicles repainted or refinished;

b. the company identification for each coating and cleanup material employed;

c. the number of gallons of each coating and cleanup material employed;

d. the VOC content of each coating and cleanup material, in pounds per gallon; and

e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. 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: methyl ethyl ketone

TLV (mg/m3): 599
Maximum Hourly Emission Rate (lbs/hr): 1.68 (combined K001 and K002)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 500.7
MAGLC (ug/m3): 14,262

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 1.68 (combined K001 and K002)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 500.7
MAGLC (ug/m3): 4,476

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 1.68 (combined K001 and K002)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 500.7
MAGLC (ug/m3): 4,881

3. 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.

4. 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 submit deviation (excursion) reports which include an identification of each day during which the total organic compound emissions exceeded 20.2 pounds per day, and the actual organic compound emissions for each such day.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2 of this permit.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in

accordance with the following method(s):

Emission Limitation

20.2 lbs per day volatile organic compounds (VOC)
3.69 tpy VOC

Applicable Compliance Method

Compliance with the daily emission limitation shall be determined by the record keeping requirements of section C.1 of these T&Cs. Compliance with the annual emission limitation shall be determined by multiplying the daily emission rate by the actual number of days the emissions unit was in operation and dividing by 2000 lbs/ton.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 1677011135 Emissions Unit ID: P901 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Sand Blaster - sand blasting of metal parts	OAC rule 3745-31-05(A)(3) (PTI 16-02210)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-16-07(B)(1), 3745-17-08(B), and 3745-17-11. 0.551 lb/hr particulate 2.41 tpy particulate 10% opacity as a 6-minute average See A.2.a below.
	OAC rule 3745-17-07(A)(1), (B)(1)	See B.1 below.
	OAC rule 3745-17-08(B)	See A.2.a below.
	OAC rule 3745-17-11	

2. **Additional Terms and Conditions**

(a) The emissions limit based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. **Operational Restrictions**

1. The permittee shall only operate the emissions unit in an enclosure with no open windows and /or doors.

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

1. None

D. **Reporting Requirements**

1. The permittee shall submit deviation reports 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(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation

0.551 lb/hr particulate
2.41 tpy particulate

Applicable Compliance Method

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the maximum hourly silica usage by the AP-41 (9/97) Table 13.2.6-1 emission factor of 27 lb particulate per 1000 lb abrasive. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.
Emission Limitation

10% opacity as a 6-minute average

Applicable Compliance Method

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

F. **Miscellaneous Requirements**

1. None