

Facility ID: 1677020154 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.

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

Facility ID: 1677020154 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 - Durabright Coating Line - electrostatic coating of aluminum truck wheels - electrostatic paint booth and tunnel oven - controlled with thermal oxidizer.	OAC rule 3745-31-05(A)(3) (PTI 16-02428)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(B)(6). 1.14 pounds per hour volatile organic compounds (VOC)
	OAC rule 3745-21-09(B)(6)	4.99 tons VOC/yr 81% overall control efficiency 90% destruction efficiency See A.2.a below.
	OAC rule 3745-21-09(U)	Exempt (see A.2.a below).

2. **Additional Terms and Conditions**
 - (a) In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee shall employ a control system that provides not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1,500 degrees Fahrenheit.

The operation of the control equipment outside of the restrictions established above may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitation shall be determined by performing concurrent mass emission tests and parameter readings, using USEPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified above is indicative of a possible violation of the mass emission limitation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,500 degrees Fahrenheit; and
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall collect and record the following information for each day the emissions unit is in operation:
 - 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;
 - c. The number of gallons of each coating and cleanup material employed; and
 - d. The total number of hours the emissions unit was in operation.
 - e. The VOC emission rate, in pounds, i.e., summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials.
 - f. The average hourly VOC emission rate, in pounds/hr (average)), i.e., (e/d).

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

3. The permit to install for this emissions unit (K002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-butanol

TLV (mg/m3): 160.63

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.07

MAGLC (ug/m3): 1,443

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

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 the 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 quarterly deviation (excursion) reports, in accordance with Part 1 - General Term and Condition 3 of this permit, that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.
 - b. All exceedances of the average daily VOC emission limitation of 1.14 pounds.
2. The permittee shall submit summary quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The quarterly summaries shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit annual reports that specify the actual annual VOC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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 Limitations:

1.14 pounds VOC per hour
4.99 tons VOC/yr

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 25/25A, or 18, as appropriate of 40 CFR Part 60, Appendix A and procedures specified in OAC rule 3745-21-10.

Compliance with the annual allowable VOC emission limitation shall be determined by multiplying the hourly VOC emission rate by the actual number of hours of operation (sum the daily numbers of hours of operation, from section C.2, for the calendar year), and then dividing by 2,000 lbs/ton.
Emission Limitation:

81% overall control efficiency, by weight, for VOC
90% destruction efficiency, by weight, for VOC

Applicable Compliance Method:

If required, compliance with both the overall control and destruction efficiencies shall be determined based on the results of emission testing conducted in accordance with Methods 25/ 25A, or 18 and 204 through 204F of 40 CFR Part 60, Appendix A and procedures specified in OAC rule 3745-21-10.3
2. 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, the permittee 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