

Facility ID: 1677050158 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: 1677050158 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
miscellaneous metal parts coating line	OAC rule 3745-31-05 (PTI 16-1829)	1% opacity as a 6-minute average
		52.8 lbs/day of volatile organic compounds (VOC)*
		9.6 tpy of VOC*
		2.4 tpy of particulates
	OAC rule 3745-17-07	* includes VOC emissions from cleanup materials See A.2.a below.
	OAC rule 3745-17-11	0.551 lb/hr of particulates
	OAC rule 3745-21-09(U)	See B.1 below.

2. Additional Terms and Conditions

- (a) The visible particulate emissions limitation required by OAC rule 3745-17-07 is less stringent than the visible particulate emissions limitation required by OAC rule 3745-31-05. The permittee shall employ a properly installed high volume low pressure (HVLP) spray application system, in accordance with the manufacturer's recommendations, instructions, and operating manual (s). The permittee shall employ properly installed spray booth exhaust fan filter elements, in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The annual VOC emission limitation is based upon the emissions unit's potential to emit. Therefore, no recordkeeping, deviation reporting, or emissions calculations are required to demonstrate compliance with this limit. The permittee shall employ only the coating formulations, as specified in the permit application. Coating formulations which emit lower VOC, HAP, and/or particulates may be employed, provided it does not result in any violations of the emission limitations and/or the OEPA "Air Toxics Policy", as described in section F.1.

B. Operational Restrictions

1. The permittee shall not employ more than 10.0 gallons of coating, as applied, in any one day in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating, as applied, in pounds per gallon;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the number of gallons of each coating, as applied;
 - e. the total number of gallons of all coatings employed;

- f. the number of gallons of each cleanup material employed; and
- g. the total VOC emission rate from all coatings and cleanup materials employed, in pounds.

D. Reporting Requirements

1. 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.
2. The permittee shall submit deviation (excursion) reports identifying each day the VOC emissions from this emissions unit exceeded the VOC emissions limitation of 52.8 lbs/day, and the actual VOC emissions for each such day.
3. 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 Limitation:

52.8 lbs/day of VOC

Applicable Compliance Method:

$E = \text{Sum of } (P \times V_p) \text{ for all paint formulations employed each day plus the sum of } (C \times V_c) \text{ for all cleanup materials employed each day}$

where,

$E = \text{VOC emission rate from all paint formulations and cleanup materials employed each day (lbs/day);}$

$P = \text{daily usage rate of each paint formulation employed each day (gals/day);}$

$V_p = \text{VOC content of each paint formulation employed each day (lbs/gal).}$

$C = \text{daily usage rate of each cleanup material employed each day (gals/day); and}$

$V_c = \text{VOC content of each cleanup material employed each day (lbs/gal).}$

Emission Limitation:

0.551 lb/hr of particulates

Applicable Compliance Method:

$E = P \times S \times (1-TE) \times (1-CE)$

where,

$E = \text{particulates emission rate (lbs/hr);}$

$P = \text{maximum paint usage rate (gals/hr);}$

$S = \text{maximum solids content of paint (lbs/gal);}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (TE = 0.75 for the HVLP method used at this facility); and}$

$CE = \text{control efficiency of the control equipment (CE = 0.90 for this facility).}$

Emission Limitation:

1% opacity as a 6-minute average

Applicable Compliance Method:

USEPA Method 9, 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup material specified by the permittee in the application for PTI 16-1829. In conjunction with the best available technology requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy", based on the coating usage rate, formulation data, and the design parameters of the emissions unit's exhaust system, as specified in the permit application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for various pollutants based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the maximum acceptable ground-level concentration (MAGLC). The following summarizes the results of the modeling for toluene:

Pollutant: toluene (CAS 108-88-3)

TWA (ug/m3): 188,000

Maximum Average Hourly Emission Rate (lbs/hr): 10

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 262

MAGLC (ug/m3): 4476

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

a. any changes in the composition of the coatings or cleanup material, or the use of new coatings or cleanup material, that would result in the emission of a compound with a lower TWA threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);

c. any change in the composition of the coatings or cleanup material, or use of new coatings or cleanup material, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

d. any change in the composition of the coatings or cleanup material, or use of new coatings or cleanup material, that would result in an increase in emissions of any HAPS as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.