

Facility ID: 1677050159 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: 1677050159 Emissions Unit ID: P001 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>
Dipping operation - filter dipping in liquid organic mixture - one mix tank with agitator and two dip tanks	OAC rule 3745-31-05(A)(3) PTI 16-01950	135 lbs/hr organic compounds (OC) 6.59 lbs/gal OC See B.1 below. 45.0 tpy OC based upon a rolling, 12-month summation of the monthly emissions. See A.2.a - A.2.c below. See B.2 below.
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

- (a) The maximum annual coating usage and the annual emissions of organic compounds from this emissions unit shall not exceed the following, based upon a rolling, 12-month summation of the monthly coating usage and emissions:

13,656 gallons of coating applied per year; and
45.0 tons of organic compounds (OC).
To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating usage and emission levels specified in the following table:

Month(s) of Organic Compounds (Tons) Usage	Maximum Allowable Cumulative Coating	Maximum Allowable Cumulative Emissions
1	7.5	2,276
1-2	7.5	2,276
1-3	15.0	4,552
1-4	15.0	4,552
1-5	22.5	6,828
1-6	22.5	6,828
1-7	30.0	9,104
1-8	30.0	9,104
1-9	37.5	11,380
1-10	37.5	11,380
1-11	45.0	13,656
1-12	45.0	13,656

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation and emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the coating usage for this emissions unit, in gallons, and the annual emission limitations, in tons.

B. Operational Restrictions

1. The permittee shall not employ any volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) or any hazardous air pollutants (HAPs).

2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the dipping operation:
- the company identification for each coating and cleanup material employed;
 - the chemical name and identification for each solvent employed;
 - the number of gallons of each coating and cleanup material employed;
 - the total number of gallons of all coatings employed;
 - the organic compound content of each coating and cleanup material, in pounds per gallon;
 - the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - the total number of hours the emissions unit was in operation; and,
 - the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(g), in pounds per hour (average).

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

2. The permittee shall maintain monthly records of the following information for this emissions unit:
- the cumulative coating usage for each month, i.e, the monthly summation of C.1.d;
 - the cumulative, monthly organic compound emissions, i.e., the monthly summation of C.1.f, in tons;
 - beginning after the first 12-months of operation following the issuance of this permit, the rolling 12-month summation of the coating usage figures, in gallons, and the rolling 12-month summation of organic compound emissions, in tons.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage and cumulative organic compound emissions for each calendar month.

- identify whether or not volatile organic compounds (VOC) containing coatings were employed as defined in OAC rule 3745-21-01(B)(6); and,
 - identify whether or not hazardous air pollutant (HAP) containing coatings were employed as defined in OAC rule 3745-77-01.
3. The permit to install for this emissions unit (P001) 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: acetone

TLV (mg/m3): 1,780

Maximum Hourly Emission Rate (lbs/hr): 135

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,121.6

MAGLC (ug/m3): 28,262

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:
- 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.).
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(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.

6. 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 average hourly total organic compound emissions exceeded 135 pounds per hour, and the actual average hourly organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for organic compounds and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.
4. The reports shall be submitted as specified in the General Conditions of this permit.
5. 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.
6. The permittee shall submit annual reports which specify the following:
 - a. coating usage, in gallons; and,
 - b. OC emissions , in tons, for this emissions unit.

This report 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 Limitation:

135 lbs/hr organic compounds

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these T&Cs.

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 organic compound contents of the coatings and inks.

Emission Limitation:

45.0 tpy OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.2 of these T&Cs.

F. Miscellaneous Requirements

1. None