

Facility ID: 1677050175 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: 1677050175 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>
Binks paint booth	OAC rule 3745-31-05 (PTI 16-1831)	2.4 lbs/hr of volatile organic compounds (VOC)
		1.66 tpy of VOC/single HAP (all VOC emissions are considered to be HAP emissions)
		2.4 tpy of particulates
		See B.1, B.2, and B.3 below.
		See A.2.a below.
	OAC rule 3745-17-07	0.551 lb/hr of particulates
	OAC rule 3745-17-11	3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(U)	

**2. Additional Terms and Conditions**

- (a) Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 2760 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

. Maximum Allowable  
Month(s) Cumulative Coating Usage (in gallons)

- 1 230
- 1-2 460
- 1-3 690
- 1-4 920
- 1-5 1150
- 1-6 1380
- 1-7 1610
- 1-8 1840
- 1-9 2070
- 1-10 2300
- 1-11 2530
- 1-12 2760

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons per year for any single HAP and 24.9 tons per year for the combination of HAPs.
  3. For the purpose of avoiding Title V, all VOC emissions are considered to be HAP emissions.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each month for the line:
    - a. the name and identification number of each coating, as applied;
    - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
    - c. the VOC content of each coating, as applied;
    - d. the number of gallons of each coating employed in this emissions unit;
    - e. the total number of gallons of all coatings employed in this emissions unit;
    - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage figures;
    - g. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month;
    - h. the name and identification of each cleanup material employed;
    - i. the VOC content of each cleanup material, in pounds per gallon;
    - j. the number of gallons of each cleanup material employed; and
    - k. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month 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.
  2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
  3. 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.
  4. 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.
- E. Testing Requirements**
1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

2.4 lbs/hr of VOC

Applicable Compliance Method:

Multiply the maximum hourly usage rate of coating by the VOC content in pound(s) of VOC per gallon of coating.

Emission Limitation:

3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Method 24 shall be used to determine the VOC contents for all coatings employed in this emissions unit. The permittee shall obtain a Method 24 analysis of each coating employed in this emissions unit from the coating supplier or shall conduct a Method 24 for each coating employed in this emissions unit.

Emission Limitation:

1.66 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping of the coating usage and VOC content required in section C.1.

Emission Limitation:

0.551 lb/hr of particulates

Applicable Compliance Method:

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

where,

E = maximum particulate emissions rate (lb/hr);

P = maximum paint usage rate (gals/hr);

S = maximum solids content of paint (lbs/gal);

TE = 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 = 0.25 for the coating application method used at this facility); and

CE = control efficiency of the control equipment (CE = 0.95 for this facility).

Future testing may be required in accordance with the requirements and procedures as specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

F. **Miscellaneous Requirements**

1. None