

Facility ID: 1677080042 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.

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[Go to Part II for Emissions Unit K005](#)

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Facility ID: 1677080042 Emissions Unit ID: K004 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>
UV screen coater - line no. 4	OAC rule 3745-31-05 (PTI 16-1865)	8.0 lbs/hr of organic compounds (OC) 40 lbs/day of OC 7.3 tpy of OC
		See B.1 and B.2 below.
	OAC rule 3745-21-07(G)(2)	See A.2.a below.

2. **Additional Terms and Conditions**
 - (a) The hourly and daily OC emissions limitations based on OAC rule 3745-21-07(G)(2) are equal to the hourly and daily OC emissions limitations established pursuant to the best available technology requirements specified in OAC rule 3745-31-05.

B. Operational Restrictions

1. The permittee shall only employ UV curable coatings in this emissions unit.
2. The permittee shall only employ coatings that have an OC content of less than 10% OC, by weight.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating, in pounds per gallon and in weight percent, and of each cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the number of hours the emissions unit was in operation; and
 - f. the calculated average hourly organic compound emission rate; i.e. (d)/(e), 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 collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. the background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 the following information:
 - a. an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 lbs/day, and the actual OC 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 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 daily record showing the use of noncomplying coatings (i.e., any coating that exceeds the 10 percent, by weight, OC coating content limitation). 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 organic compound emissions from this emissions unit for the previous calendar year, in pounds or tons. These reports shall be submitted by January 31 of each year.

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:

8.0 lbs/hr of OC
40.0 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1, D.1, D.2, and D.4 of this permit. Daily records shall be maintained of the OC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated daily and average hourly OC emission rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.

Emission Limitation:

organic content of coatings employed shall not exceed 10%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1.c and D.3 of this permit. Daily records shall be maintained of the OC content of each coating employed. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating employed.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant from both emissions units K004 and K005: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 339.4

MAGLC (ug/m3): 23,405

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
- 3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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 final permit to install prior to the change.

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Facility ID: 1677080042 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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- 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>
UV screen coater - line no. 5	OAC rule 3745-31-05 (PTI 16-1865)	8.0 lbs/hr of organic compounds (OC) 40 lbs/day of OC 7.3 tpy of OC
		See B.1 and B.2 below.
	OAC rule 3745-21-07(G)(2)	See A.2.a below.

- 2. **Additional Terms and Conditions**
 - (a) The hourly and daily OC emissions limitations based on OAC rule 3745-21-07(G)(2) are equal to the hourly and daily OC emissions limitations established pursuant to the best available technology requirements specified in OAC rule 3745-31-05.

B. Operational Restrictions

- 1. The permittee shall only employ UV curable coatings in this emissions unit.
- 2. The permittee shall only employ coatings that have an OC content of less than 10% OC, by weight.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating, in pounds per gallon and in weight percent, and of each cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;

- e. the number of hours the emissions unit was in operation; and
- f. the calculated average hourly organic compound emission rate; i.e. (d)/(e), 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 collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. the background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 the following information:
 - a. an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 lbs/day, and the actual OC 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 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 daily record showing the use of noncomplying coatings (i.e., any coating that exceeds the the 10 percent, by weight, OC coating content limitation). 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 organic compound emissions from this emissions unit for the previous calendar year, in pounds or tons. These reports shall be submitted by January 31 of each year.

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:

8.0 lbs/hr of OC
40.0 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1, D.1, D.2, and D.4 of this permit. Daily records shall be maintained of the OC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated daily and average hourly OC emission rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.
Emission Limitation:

organic content of coatings employed shall not exceed 10%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1.c and D.3 of this permit. Daily records shall be maintained of the OC content of each coating employed. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating employed.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing 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 each pollutant:

Pollutant from both emissions units K004 and K005: isopropyl alcohol

TLV (mg/m3): 983

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 339.4

MAGLC (ug/m3): 23,405

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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 final permit to install prior to the change.