

Facility ID: 1677080043 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: 1677080043 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>
Spray booth - coating miscellaneous metal parts	OAC rule 3745-31-05 (PTI 16-1773)	25.0 lbs/day of volatile organic compounds (VOC)
		4.56 tpy of VOC
		See B.1 below.
		0.551 lb/hr of particulate matter
		2.41 tpy of particulate matter
		1% opacity as a 6-minute average
		See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.a below.
	OAC rule 3745-21-09(U)	See A.2.a below.

2. Additional Terms and Conditions

- (a) The emissions limit based on this rule is equivalent or less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons.

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 employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information for the coating line on a monthly basis:
 - 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 VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month;
 - e. the total number of days the emissions unit was in operation; and
 - f. the average daily VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per day (average).

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

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 which include an identification of each month during which the average daily total VOC emissions exceeded 25.0 lbs/day, and the actual average daily VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in 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:

25.0 lbs/day of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of section C.2 of this permit.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for each coating and cleanup material employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
Emission Limitation:

0.551 lb/hr of particulate matter

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the STAPPA & ALAPCO derived particulate emission factor of 0.206 pound per gallon of coating employed by the maximum number of gallons of coatings employed per hour.
Emission Limitation:

1% opacity as a 6-minute average

Applicable Compliance Method:

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

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 16-1773. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the xylene, toluene, and n-butyl acetate emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant 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 each pollutant:

Pollutant: n-butyl acetate

TLV (mg/m3): 713
Maximum Hourly Emission Rate (lbs/hr): 14.0
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 125.1
MAGLC (ug/m3): 16,976

Pollutant: xylene

TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 14.0
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 125.1
MAGLC (ug/m3): 10,333

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 14.0
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 125.1
MAGLC (ug/m3): 4,476
2. 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 materials, or the use of coatings or cleanup 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. 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 materials, or use of new coatings or cleanup materials, 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 materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (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.