

Facility ID: 1677110035 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: 1677110035 Emissions Unit ID: P005 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>
P005 - Stain Machine #1 - application of stain to wooden parts	OAC rule 3745-31-05(A)(3) (PTI 16-02448)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-35-07 OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions shall not exceed 0.18 lb/hr, and 0.79 ton per year. See Sections A.2.a - A.2.d below.
	OAC rule 3745-21-07(G)	See B.1 below.

2. Additional Terms and Conditions

- (a) The combined annual coatings usage input rates* and combined annual emissions from the entire facility (P003 - P005, and R002 - R004, combined) shall not exceed the following as rolling, 12-month summations:
 - i. 99.5 tons of VOC;
 - ii. 24.5 tons of the combined hazardous air pollutants (HAPs); and
 - iii. 9.95 tons of any individual HAP.

*The annual coatings usage (VOC) input rates are equivalent to the annual VOC emission rates, based upon 100% of the solvent in the coating materials being emitted.
The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 tons/yr for any single HAP and 25 tons/yr for any combination of HAPs, based upon rolling, 12-month summations.
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 input rates* and emissions levels specified in the following table:

Month	Maximum Allowable Coating Usage Input Rates (tons)	Maximum Allowable Cumulative Emissions of VOC (tons)*	Maximum Allowable Cumulative Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions of Combined HAP (tons)
1	8.3	0.82	2.0	
1-2	16.6	1.64	4.0	
1-3	24.9	2.46	6.0	
1-4	33.2	3.28	8.0	
1-5	41.5	4.10	10.0	
1-6	49.8	4.92	12.0	
1-7	58.0	5.74	14.0	
1-8	66.3	6.56	16.0	
1-9	74.6	7.38	18.0	
1-10	82.9	8.20	20.0	
1-11	91.2	9.02	22.0	

1-12 99.5 9.95 24.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide coatings usage input rates limitation and VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable coatings usage input rates and the HAP and VOC emission limitations, in tons.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material (coating or cleanup material), as defined by 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 each month for each coating and cleanup material for emissions units P003 - P005, R002 - R004, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;
 - c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
 - e. the number of gallons of each coating employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions from all the coatings and cleanup materials employed, in pounds [for each HAP, the sum of (c) times (e) for all the coatings plus the sum of (f) times (h) for all the cleanup materials];
 - j. the total combined HAPs emissions from all the coatings and cleanup materials employed, in pounds [the sum of (d) times (e) for all the coatings plus the sum of (g) times (h) for all the cleanup materials];
 - k. the total VOC emissions from all the coatings and cleanup materials employed, in pounds [the sum of (b) times (e) for all the coatings plus the sum of (b) times (h) for all the cleanup materials];
 - l. during the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC input rates, VOC emissions, total individual HAP, and total combined HAPs emissions, in tons, from all the coatings and cleanup materials;
 - m. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month total VOC input rates and VOC emissions from all the coatings and cleanup materials employed, in tons;
 - n. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month individual HAP emissions from all the coatings and cleanup materials employed, in tons; and
 - o. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month total combined HAPs emissions from all the coatings and cleanup materials, in tons.
2. The permittee shall collect and record the following information for each month for the coating operation for this emissions unit:
 - 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 number of hours the emissions unit was in operation;
 - e. the total VOC emission rate for all the coatings and cleanup materials [summation of x b) for all coatings + summation of x b) for all cleanup materials] , in pounds per day; and
 - f. the average hourly VOC emission rate for all the coatings and cleanup materials, i.e. (e)/(d), 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.]

D. Reporting Requirements

1. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable monthly cumulative VOC input rate restrictions established in Section A.2.c.;
 - b. all exceedances of the maximum allowable monthly cumulative VOC emission limitations established in Section A.2.c.;

- c. all exceedances of the maximum allowable monthly cumulative individual HAP emission limitations established in Section A.2.c.; and
 - d. all exceedances of the maximum allowable monthly cumulative combined HAPs emission limitations established in Section A.2.c..
2. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month VOC input rate restriction of 99.5 tons;
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 99.5 tons;
 - c. all exceedances of the rolling, 12-month individual HAP emission limitation of 9.95 tons; and
 - d. all exceedances of the rolling, 12-month combined HAPs emission limitation of 24.5 tons.
 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the average hourly mass emission limitation for VOC of 0.18 pound, and the actual VOC emissions for each such period.
 4. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
 5. The permittee shall submit annual reports that specify the VOC, total HAPs, and individual HAP emissions, in tons, for emissions unit P003 - P005, R002 - R004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 6. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of noncomplying coatings (i.e., photochemically reactive coatings) in this emissions unit. 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.

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:

99.5 tpy VOC for (for emissions units P003 - P005, and R002 - R004, combined)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements established in section C.1 of these T&Cs.

Emission Limitation:

24.5 tpy of all HAPs (for emissions units P003 - P005, and R002 - R004, combined)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements established in section C.1 of these T&Cs.

Emission Limitation:

9.95 tpy of any individual HAP (for emissions units P003 - P005, and R002 - R004, combined)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements established in section C.1 of these T&Cs.

Emission Limitations

0.18 pounds/hour VOC (for this emissions unit)
0.79 tpy VOC (for this emissions unit)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based upon the record keeping requirements established in section C.2 of these T&Cs.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).
2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

2. The following terms and conditions of this permit to install are federally enforceable: A - F.