

Facility ID: 1677110075 Issuance type: Draft 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: 1677110075 Emissions Unit ID: K002 Issuance type: Draft 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>
misc. metal parts paint spray booth with disposable paper filters to control fugitive particulate matter emissions and a bake oven	OAC rule 3745-31-05 (PTI 16-1231)	17.85 lbs/hr of VOC 78.2 tpy of VOC
		The hazardous air pollutant (HAP) limits established in this PTI are less stringent than the HAP limits established under OAC rule 3745-35-07 below.
		See A.2.c below.
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating
	OAC rule 3745-17-07	20% opacity as a 6-minute average
	OAC rule 3745-17-11	0.551 lb/hr of particulates
	OAC rule 3745-35-07	See A.2.a, A.2.b, and B.1 through B.4 below.

2. Additional Terms and Conditions

- (a) The emissions of any individual HAP from this emissions unit shall not exceed 9.9 tpy. The emissions of total combined HAPs from this emissions unit shall not exceed 24.9 tpy. The permittee shall properly install and maintain a spray booth exhaust filter system.

B. Operational Restrictions

1. The maximum hourly usage of coatings, as applied, shall not exceed 2.0 gallons/hr.
2. The maximum annual coating usage for this facility shall not exceed 17,520 gallons, based on an hourly usage limit of 2 gallons per hour.
3. Each coating employed in this emissions unit shall have a total HAPs content of 2.84 pounds per gallon or less, as applied, and no individual HAP content shall be greater than 1.13 pounds per gallon, as applied.
4. HAP emissions from cleanup solvents shall not exceed 2.0 tpy. Cleanup solvent emissions shall be counted against the allowable emission limitations for HAPs.

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;
 - c. the total volume, in gallons, of all of the coatings employed;
 - d. the total number of hours the emissions unit was in operation;
 - e. the average hourly coating usage rate in gallons/hour (c/d);
 - f. the net number of gallons of each cleanup material employed;

- g. the VOC content of each coating and each cleanup material employed, in pounds per gallon;
 - h. the VOC emissions from all coatings and cleanup materials, in pounds; and
 - i. the average hourly VOC emission rate from all coatings and cleanup materials, in pounds per hour (h/d).
2. The permittee shall maintain monthly records of the following information:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the total HAP content of each coating, as employed, in pounds per gallon of coating;
 - c. the name and content of each individual HAP of each coating, as employed, in pounds per gallon;
 - d. the emission rate of total HAPs and each individual HAP, in pounds per month, for all coatings employed;
 - e. the total HAP content of each cleanup material, as employed, in pounds per gallon of cleanup material;
 - f. the name and content of each individual HAP of each cleanup material, as employed, in pounds per gallon;
 - g. the emission rate of total HAPs and each individual HAP, in pounds per month, for all cleanup materials employed;
 - h. the total HAPs emissions and individual HAP emissions for all coatings and cleanup materials, in tons;
 - i. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - j. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for CVOC,2.
3. The permittee shall collect and record for each day for this emissions unit whether or not the disposable paper filtration system was in service when the emissions unit was in operation.

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 hourly coating usage limit (2.0 gallons per hour). 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 notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the disposable paper filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the event occurs.
- 3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the coating line employed any coating with an individual HAP content or total HAPs content greater than the allowable limitations specified in section B.3 of this permit (i.e., 1.13 pounds/gallon and 2.84 pounds/gallon, respectively). 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.
- 4. 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 (i.e., having a VOC content greater than 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents). 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.
- 5. The permittee shall submit annual reports which specify the total coating usage (in gallons), the individual HAP emissions (in tons), the total HAP emissions (in tons), the total HAP emissions from cleanup material (in tons), and the total VOC emissions (in tons) for this emissions unit. These reports shall cover the previous calendar year, and include the emission calculations. The reports shall be submitted by February 15 of each year.

E. Testing Requirements

- 1. Compliance with the emission limitations and the operational restrictions in sections A.1, A.2, and B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

Emission Limitation:

0.551 lb/hr of particulates

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

$E = \text{particulate emissions rate (lbs/hr)}$

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

CE = fractional control efficiency of the control equipment

If required, emission testing shall be performed in accordance with the procedures in 40 CFR Part 60, Appendix A, Method 5.

Operational Restriction:

use of no more than 2 gallons of coatings per hour

Applicable Compliance Method:

Daily records shall be maintained of the daily usage of all coatings employed and the number of hours the line was in operation. The average hourly coating usage rate shall be calculated and recorded.

Operational Restriction:

The maximum annual coating usage shall not exceed 17,520 gallons, based on the 2.0 gallons per hour usage limitation.

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all coatings employed in the line. The summation of these records shall be used to document compliance with the annual coating usage limitation.

Operational Restriction:

Coatings employed shall not exceed a total combined HAP content of 2.84 pounds per gallon, as applied, and no individual HAP content shall exceed 1.13 pounds per gallon, as applied.

Applicable Compliance Method:

Formulation data shall be used to determine the HAP content of each coating employed.

Operational Restriction:

HAP emissions from cleanup solvents used shall not exceed 2 tpy.

Applicable Compliance Method:

The monthly record keeping required in section C.2 of this permit along with formulation data are sufficient to demonstrate compliance with these emission limitations.

Operational Restriction:

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Emission Limitation:

9.9 tpy of any individual HAP
24.9 tpy of total combined HAP

Applicable Compliance Method:

The daily and monthly record keeping required in section C.2 of this permit along with formulation data are sufficient to demonstrate compliance with these emission limitations.

Emission Limitation:

17.85 lbs/hr of VOC
78.2 tpy of VOC

Applicable Compliance Method:

The daily and monthly record keeping required in sections C.1 and C.2 along with method 24 are sufficient to demonstrate compliance with these emission limitations.

F. Miscellaneous Requirements

1. The following terms and conditions constitute the federally enforceable portions of this permit, pursuant to OAC rule 3745-35-07: A, B, C, D, E, and F.