

Facility ID: 1677110075 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: 1677110075 Emissions Unit ID: K003 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>
K003 (Paint Line #3) miscellaneous metal parts surface coating line, includes: paint spray booth with filtered exhaust to control paint overspray, high volume low pressure (HVLP) paint application method, employment of extreme performance coatings, and two (2) natural gas-fired curing ovens, each rated under 0.5 million Btu/hour heat input; air emissions of organic compounds (OCs) and volatile OCs (VOCs) uncontrolled	OAC rule 3745-31-05(A)(3) (PTI 16-02352)	3.1 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.  The permittee shall not exceed the following OC emissions limitations: 155 pounds/day from coating; 86 pounds/month from cleanup; and 28.8 tons/year from coating & cleanup.
	OAC rule 3745-21-09(U)(1)(c)	The permittee shall employ a filtered spray booth exhaust system that effectively controls paint overspray at all times the emissions unit is in operation.  See Part II, Section A.2 below for additional requirements of OAC rule 3745-31-05(A)(3).  The emissions control requirements of this rule are less stringent than the emissions control requirements established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- (a) The 155 pounds/day, 86 pounds/month, and 28.8 tons/year OC emissions limitations regulated per OAC rule 3745-31-05(A)(3) are based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with these emissions limits.  
  
However, if any proposed change(s), such as with production capacity, the types and/or quantities of coatings and/or solvents used, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).  
As a way to reduce air emissions of OCs, all coatings, hardeners, cleanup solvents/rags, and all other organic solvent containing materials shall be properly identified and held in tightly closed containers at all times when not in use or waiting for appropriate off-site disposal.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating, as applied, per final blend formulation; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied, per final blend formulation, in pounds of VOCs per gallon of coating.

USEPA Method 24 shall be used to determine the VOC content of each coating, as applied, per final blend formulation.

2. The permit to install for K003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl n-amyl ketone CAS 110-43-0  
 TLV (ug/m3): 233,000  
 Maximum Average Hourly Emission Rate (lbs/hr): 20.0  
 Predicted 1-Hour Maximum Ground-Level Concentration at 39 m (ug/m3): 575  
 MAGLC (ug/m3): 5548

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

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 previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).  
 If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

**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 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.

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A.1 of these special terms and conditions shall be determined in accordance with the following methods:  
 Emission Limitation: 155 pounds of OCs/day from coating

Applicable Compliance Method: the above daily OC emissions limit is based on the potential to emit, as demonstrated below.

D = CO;

Where:

D = 155 pounds of OCs/day [daily potential to emit from coating];

C = 50 gallons/day [potential coating rate]; and

O = 3.1 pounds/gallon [maximum coating OC content].

Emission Limitation: 86 pounds of OCs/month from cleanup

Applicable Compliance Method: the above monthly OC emissions limit is based on the potential to emit, as demonstrated below.

M = CO;

Where:

M = 86 pounds of OCs/month [maximum emissions from cleanup];

C = 10 gallons/month [maximum volume of monthly cleanup usage]; and

O = 8.6 pounds/gallon [cleanup OC content].

Emission Limitation: 28.8 tons of OCs/year from coating & cleanup

Applicable Compliance Method: the above yearly OC emissions limit is based on the potential to emit, as demonstrated below.

$Y = [D(365 \text{ days/year}) + M(12 \text{ months/year})](1 \text{ ton}/2000 \text{ pounds});$

Where:

Y = 28.8 tons of OCs/year [yearly potential to emit from coating & cleanup]

D = 155 pounds of OCs/day [daily potential to emit from coating]; and

M = 86 pounds of OCs/month [maximum emissions from cleanup].

F. **Miscellaneous Requirements**

1. K003 is a replacement of K002 (Paint Line #2). The permittee shall permanently shut down K002 and all associated activities of K002, as specified in application # 16-1231, prior to production operation of K003.