

Facility ID: 1677120017 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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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> |
|---------------------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Two air-dry spray booths - spray painting hydraulic tailgates | OAC rule 3745-31-05(A)(3) (PTI 16-0823) OAC rule 3745-21-09(U) | The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U). Volatile organic compounds (VOC) shall not exceed 2.15 tons per year. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents. |

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. The VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied;
 - c. The number of gallons (excluding water and exempt solvents) of each coating and cleanup material, as applied;
 - d. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and
 - e. The daily VOC emissions from all the coatings and cleanup materials employed, in pounds, [i.e., the sum of (b) times (c) for each coating and cleanup material employed].

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

3. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coatings and cleanup materials for the calendar year in Section C.2].

D. Reporting Requirements

1. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit an annual report that indicates annual VOC emissions for this emissions unit, in tons per year.

The report shall be submitted to the Director (the Akron RAQMD) by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following methods:
 Emissions Limitation:
 daily volume-weighted average of 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

 Applicable Compliance Method:
 Compliance shall based upon the record keeping specified in Section C.2.
 Emissions Limitation:
 2.15 TPY of VOC emissions

 Applicable Compliance Method:
 Compliance shall based upon the record keeping specified in Section C.3.
2. U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. 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 ink, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. Miscellaneous Requirements

1. None

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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> |
|---------------------------------------------------------------|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Cylinder spray booth - surface coating of hydraulic cylinders | OAC rule 3745-31-05(A)(3) (PTI 16-1316) | The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U). Volatile organic emissions (VOC) shall not exceed 16.5 lbs/day. |
| | OAC rule 3745-21-09(U) | The permittee shall not employ more than 3 gallons of coating material per day for the coating of |

miscellaneous metal parts.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating and cleanup material employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total number of gallons of all the coatings employed; and
 - e. the total VOC emissions from all the coatings and cleanup materials employed, in pounds [i.e., the sum of (b) times (c) for each coating and cleanup material employed].

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 notify the Director (the Akron RAQMD) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation reports that identify each day the VOC emissions exceeded the daily emissions limit specified above.

The quarterly deviation reports shall be submitted to the Director (the Akron RAQMD) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:
3 gallons per day total coating usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.d.

Emissions Limitation:

16.5 lbs. per day of VOC emissions from coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.e.

U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. 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 ink, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. **Miscellaneous Requirements**

1. None