

Facility ID: 0125041935 Issuance type: Final State Permit To Operate

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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: 0125041935 Emissions Unit ID: K002 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>
prime coater and oven controlled by a Permanent Total Enclosure(PTE) with a thermal incinerator	OAC rule 3745-31-05. (PTI 01-2223)	0.30 LB VOC/gallon of coating minus water applied as a daily volume-weighted average 0.12 Kg VOC/liter of solids applied as a monthly volume-weighted average 2.0 LB CO/mmBtu during startup 0.5 LB CO/mmBtu during normal operation 0.4 LB NOx/mmBtu See A.2 and B
	OAC rule 3745-21-09(E)	The limits established by the BAT determination are more stringent than those established by this rule.
	40 CFR Part 60 subpart TT	The limits established by the BAT determination are more stringent than those established by this rule.

2. **Additional Terms and Conditions**
 - (a) The total VOC emissions discharged from this emissions unit shall be reduced by 95%.
For the purpose of this permit, the reignition of the incinerator burner due to a temporary burner flame out shall not be counted as a startup.

B. Operational Restrictions

1. The thermal incinerator shall operate at all times during which this emissions unit is in operation.
2. The total number of startups of the thermal incinerator shall be limited to 52 per rolling, 12-month period and the total operating time of the thermal incinerator shall not exceed 3900 hours per rolling, 12-month period including startup time.
3. The PTE shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.018 inches of water, whenever the emissions unit is in operation.
4. The VOC content of each finish coating applied shall not exceed 6.0 lbs VOC/gallon minus water.
5. The maximum heat input shall not exceed 70mmBtu/hr during startup of the incinerator and shall not exceed 60mmBtu/hr during normal operation of the incinerator.
6. The average combustion temperature within the thermal incinerator shall not be less than 1300 degrees Fahrenheit.
7. All cleanup activities associated with this source shall be conducted within the PTE. The emissions from the cleanup activities shall be vented to the incinerator serving the PTE while the incinerator is operating at or above the minimum temperature specified in B.6 above.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the coating line and control equipment:

- a. The name and identification number of each coating, as applied.
 - b. The pounds of VOC/gallon of coating minus water, as applied, and the volume minus water, as applied, of each coating.
 - c. The kilogram of VOC/liter of solids, as applied, and the volume of solids content as applied of each coating.
 - d. The maximum VOC content (in pounds of VOC/gallon of coating, minus water, as applied) and the daily volume-weighted average VOC content (in pounds of VOC/gallon of coating minus water, as applied) of all the coatings.
 - e. The calculated, controlled VOC emission rate, in pounds of VOC/gallon of coating minus water, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted average VOC content recorded in accordance with paragraph (d) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance.
 - f. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - g. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1300 degrees Fahrenheit.
2. The permittee shall collect and record the following information for each month for the coating line and control equipment:
- a. The monthly uncontrolled volume-weighted average VOC emission rate, in Kg/liter of solids applied (derived using information obtained from C.1.c.)
 - b. The calculated, controlled VOC emission rate, in kilograms of VOC/liter of solids, as applied. The controlled VOC emission rate shall be calculated using (i) the monthly uncontrolled volume-weighted average VOC content recorded in accordance with paragraph (a) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance.
 - c. The total number of startups of the incinerator employed on K001 and K002 during the previous 12-month period.
 - d. The total number of hours of operation of the incinerator employed on K001 and K002 during the previous 12-month period and each day the incinerator startup time exceeds the 3-hour restriction.
3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - c. All periods of time during which the emissions unit was in operation and during which the PTE was not maintained at the required differential pressure specified in B.3 above.
- D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of the following:
 - a. Any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC/gallon of coating limitation.
 - b. Any monthly record showing that the calculated, controlled VOC emission rate exceeds the applicable Kg of VOC/liter of solids applied limitation.
 - c. Any monthly record showing that the allowable number of incinerator startups or hours of operation has been exceeded.

The notification(s) shall include a copy or copies of such record(s) and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occur(s).
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1300 degrees Fahrenheit.
 - b. All periods of time during which the PTE was not maintained at the required differential pressure specified above.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the 0.30 lb VOC/gallon of coating emission limitation in accordance with the following requirements:

- a. The emission testing shall be conducted 6 months prior to the permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for VOCs .
 - c. The test(s) shall be conducted while the emissions unit is operating as close as possible to its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.
 - d. The capture efficiency shall be determined using method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - e. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission tests.
 - f. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.
 - g. A comprehensive written report on the results of the emissions tests shall be submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s).
2. Emission Limitation: 0.30 LB VOC/gallon of coating minus water applied as a 24-hour average and 0.12 Kg VOC/liter of solids applied as a 30-day average.
- Applicable Compliance Method:
Compliance with these emission limitations shall be demonstrated through the records required pursuant to Section C and the emission testing requirement specified above.
- Emission Limitations:
2.0 LB CO/mmBtu during startup.
0.5 LB CO/mmBtu and
0.4 LB NOx/mmBtu during normal operation.
- Applicable Compliance Method: Compliance with these emission limits shall be determined by the use of applicable AP-42 Table 1.4-1 emission factors.
- F. **Miscellaneous Requirements**
1. None