

Facility ID: 0125041956 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.

- [Go to Part II for Emissions Unit K001](#)
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Facility ID: 0125041956 Emissions Unit ID: K001 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>
floor scale paint line no. 1	OAC rule 3745-31-05(A)(3) (PTI 01-2249)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-21-09 (U)(1)(b), and 3745-21-09 (U)(1)(c).
	OAC rule 3745-21-09(U)(1)(b)	The volatile organic contents (VOC) of the zinc rich primer coatings shall not exceed 4.0 lbs/gal, excluding water and exempt solvents.
	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the extreme performance coatings shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551lb/hr based on Table 1.
	OAC rule 3745-35-07(B) (FESOP to avoid Title V and MACT)	VOC emissions from all coatings, thinners, and cleanup materials employed in K001 and K003, combined, shall not exceed 54.1 tons/rolling, 12-month period.
		Individual hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003, combined, shall not exceed 9.9 tons/rolling, 12-month period.
	Combined HAPs emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003, combined, shall not exceed 24.9 tons/rolling, 12-month period.	

See B.2 and B.3 below.

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. The permittee shall operate and maintain the dry filtration system when this emissions unit is in operation.

2. The maximum annual coating usage for emissions units K001 and K003 shall not exceed 27,200 gallons of Extreme Performance Coatings, with a maximum VOC content of 3.5 pounds per gallon, and 250 gallons for Zinc Rich Primer, with a maximum VOC content of 4.0 lbs per gallon, based upon a rolling, 12-month summation of coating usage figures.

This emission unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

3. The maximum annual cleanup material usage for emissions units K001 and K003 shall not exceed 1,800 gallons, based upon a rolling, 12-month summation of cleanup/solvent material usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup/solvent material usage, upon issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the paint line:
 - a. the name and identification of each coating;
 - b. whether each coating is an extreme performance coating or a zinc rich primer coating; and
 - c. the VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.
2. The permittee shall maintain daily records and document any time periods when the dry filtration system was not in service when this emissions unit was in operation.
3. The permittee shall collect and record the following information each month for emissions units K001 and K003:
 - a. the name and identification number of each coating (including any thinners), as applied;
 - b. the VOC content of each coating, 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 for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the VOC content of each cleanup material employed;
 - h. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - i. the total combined HAPs content of each cleanup material in pounds of combined HAPs per gallon of coating, thinner, and cleanup material, as applied (sum of all individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total individual HAP emissions for each HAP from all coating and cleanup materials in pounds or tons per rolling, 12-month period (for each HAP the sum of c times e for each coating and the sum of h times j for each cleanup material); and
 - l. the total combined HAPs emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d times e for each coating plus the sum of i times j for each cleanup material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis. emissions from all coatings and cleanup materials, in pounds or tons per rolling, 12-month period (the sum of b times e for each coating and the sum of g times j for each coating).

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings (i.e. for VOC content). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
2. The permittee shall maintain daily records and document any time periods when the dry filtration system was not in service when this emissions unit was in operation.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month Zinc Rich Primer Coating usage limitation;
 - b. the rolling, 12-month Extreme Performance Coating usage limitation;
 - c. the rolling, 12-month cleanup usage limitation;
 - d. the rolling, 12-month VOC emission limitation;
 - e. the rolling, 12-month total individual HAP emission limitation; and
 - f. the rolling, 12-month total combined HAP emissions limitation;

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

4. The permittee shall submit annual reports by April 15th each year which specify the VOC, individual and

combined HAP emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

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:
The VOC content of each extreme performance coating shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be determined through the record keeping found in Section C.1 above.

Emission Limitation:
The VOC content of each zinc rich primer coating shall not exceed 4.0 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be determined through the record keeping found in Section C.1 above.

Emission Limitation: VOC emissions from the application of coatings and cleanup/solvent materials shall not exceed 54.1 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3 of this permit

Emission Limitation:
Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001 and K003 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.3.k and II.C.3.l of this permit.
2. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coating materials.
3. Emission Limitation:
Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

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

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 (60% per 40 CFR Part 60.313)

CE = control efficiency of the control equipment (90% per manufacturer's data)

If required, compliance with the particulate matter emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
4. Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A, B, C, D, E, and F

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Facility ID: 0125041956 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>
paint spray booth and bake oven system	OAC rule 3745-31-05(A)(3) (PTI 01-6792)	<p>Volatile organic compound (VOC) emissions from coatings shall not exceed 120 lbs/hr.</p> <p>See A.2.a below.</p> <p>The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-21-09 (U)(1)(b), and 3745-21-09 (U)(1)(c).</p>
	OAC rule 3745-21-09(U)(1)(b)	The VOC contents of the zinc rich primer coatings shall not exceed 4.0 lbs/gal, excluding water and exempt solvents.
	OAC rule 3745-21-09(U)(1)(c)	The VOC contents of the extreme performance coatings shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr based on Table 1.
	OAC rule 3745-35-07(B) (FESOP to avoid Title V and MACT)	<p>VOC emissions from all coatings, thinners, and cleanup materials employed in K001 and K003, combined, shall not exceed 54.1 tons/rolling, 12-month period.</p> <p>Individual hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003, combined, shall not exceed 9.9 tons/rolling, 12-month period.</p> <p>Combined HAPs emissions from all coatings, thinners, and cleanup materials employed in emissions units K001 and K003, combined, shall not exceed 24.9 tons/rolling, 12-month period.</p> <p>See B.2 and B.3 below.</p>

2. Additional Terms and Conditions

- (a) The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, monitoring, record keeping or reporting requirements are not necessary to ensure compliance with this emission limitation.

B. Operational Restrictions

1. The permittee shall operate and maintain the dry filtration system when this emissions unit is in operation.
2. The maximum annual coating usage for emissions units K001 and K003 shall not exceed 27,200 gallons of Extreme Performance Coatings, with a maximum VOC content of 3.5 pounds per gallon, and 250 gallons for Zinc Rich Primer, with a maximum VOC content of 4.0 lbs per gallon, based upon a rolling, 12-month summation of coating usage figures.

This emission unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.
3. The maximum annual cleanup material usage for emissions units K001 and K003 shall not exceed 1,800 gallons, based upon a rolling, 12-month summation of cleanup/solvent material usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup/solvent material usage, upon issuance of this permit.

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 month for emissions units K001 and K003:

- a. the name and identification number of each coating (including any thinners), as applied;
 - b. the VOC content of each coating, 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 for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the VOC content of each cleanup material employed;
 - h. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - i. the total combined HAPs content of each cleanup material in pounds of combined HAPs per gallon of coating, thinner, and cleanup material, as applied (sum of all individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total individual HAP emissions for each HAP from all coating and cleanup materials in pounds or tons per rolling, 12-month period (for each HAP the sum of c times e for each coating and the sum of h times j for each cleanup material); and
 - l. the total combined HAPs emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d times e for each coating plus the sum of i times j for each cleanup material).
A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis. emissions from all coatings and cleanup materials, in pounds or tons per rolling, 12-month period (the sum of b times e for each coating and the sum of g times j for each coating).
3. Pollutant: Methyl Ethyl Ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 3.52
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 151.0
 MAGLC (ug/m3): 14,048

 Pollutant: Toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 8.70
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 188
 MAGLC (ug/m3): 4476
 The permit to install for emissions units K003 and P005 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 Toxic Policy") was applied for each pollutant emitted by these emissions units 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), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
4. 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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
 - 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
 - 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.)
5. If the permittee determines that the "Air Toxic 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
 - a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - where computer modeling is performed, a copy of the resulting computer model runs that show the results of

the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that the dry 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 Ohio EPA, Central District Office) within 30 days after the event occurs.
2. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month Zinc Rich Primer Coating usage limitation;
 - b. the rolling, 12-month Extreme Performance Coating usage limitation;
 - c. the rolling, 12-month cleanup usage limitation;
 - d. the rolling, 12-month VOC emission limitation;
 - e. the rolling, 12-month total individual HAP emission limitation;
 - f. the rolling, 12-month total combined HAP emissions limitation;
4. The permittee shall submit annual reports by April 15th each year which specify the VOC, individual and combined HAP emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

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:
Volatile organic compound (VOC) emissions from coatings shall not exceed 120 lbs/hr.

Applicable Compliance Method:
The hourly emission limitation was developed by multiplying the maximum hourly coating throughput of 30 gallons/hour by the maximum VOC content of 4.0 lbs/gallon. Therefore, compliance with this emission limitation can be assumed provided that the permittee complies with the applicable VOC content limitations for the coatings.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.

Emission Limitation:
The VOC content of each extreme performance coating shall not exceed 3.5 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be based on the record keeping in Section C.2

Emission Limitation:
The VOC content of each zinc rich primer coating shall not exceed 4.0 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be based on the record keeping in Section C.2.

Emission Limitation: VOC emissions from the application of coatings and cleanup/solvent materials shall not exceed 54.1 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit
2. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coating and cleanup materials.
3. Emission Limitation:
Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in lbs/hr)} \times (1-TE) \times (1-CE)$$

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

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 (60% per 40 CFR Part 60.313)

CE = control efficiency of the control equipment (90% per manufacturer's data)

If required, compliance with the particulate matter emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
4. Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part

60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A, B, C.1, C.2, D, E, and F

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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>
solvent recovery still # 1	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) (PTI 01-2249)	Exempt, see B.2 below. Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hr and 110 lbs/day.

See B.1 below.

2. Additional Terms and Conditions

- (a) The hourly and daily emission limitations are greater than the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

1. This emissions unit shall be operated with a cover at all times to minimize VOC emissions.
2. The permittee shall not employ any photochemically reactive materials in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records for each liquid organic material employed in this emissions unit that include the following:
 - a. indicate whether or not the material is a photochemically reactive material;
 - b. number of gallons of solvent consumed; and
 - c. the VOC content of the solvent.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
2. The permittee shall submit annual reports by April 15th each year which specify the VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section 1 of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitations:

VOC emissions shall not exceed 8 lbs/hr and 110 lbs/day.

Applicable Compliance Methods:

The hourly emission limitation is determined by multiplying the maximum throughput of 11.27 lbs solvent/hr by the emission factor of 3.30 lbs VOC/2000 lbs solvent (AP-42, 5th Ed., Table 4.7-1, February, 1980).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.

The daily emission limitation is determined by multiplying the maximum daily throughput of 270.48 lbs solvent/day by the emission factor of 3.30 lbs VOC/2000 lbs solvent (AP-42, 5th Ed., Table 4.7-1, February, 1980). Therefore, compliance with this emission limitation can be assumed provided that the emission factor remains valid.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A, B, C, D, E, and F

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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>
Wheelabrator horizontal plate and structural descaler (shotblaster) with baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-2249)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr based on Table 1
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

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

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4.0 to 6.0 inches of water while this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendation's, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 Emission Limitation:
 Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:
 If required, compliance with the visible particulate emission limitation shall be determined in accordance with 40

CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B).

Emission Limitation:
Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
If required, compliance with the particulate matter emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A, B, C, D, E, and F

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0125041956 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>
Solvent Recovery Still # 2	OAC rule 3745-31-05(C) (PTI 01-6792)	Volatile organic compound (VOC) emissions shall not exceed 2.34 lbs/hr and 1.51 tons/rolling, 12-month period.
	OAC rule 3745-21-07(G)(2)	See A.2.a, B.1, and B.2 below. Exempt, see B.3 below.

2. Additional Terms and Conditions

- (a) The hourly emission limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

B. Operational Restrictions

1. This emissions unit shall be operated with a cover at all times to minimize VOC emissions.
2. The maximum solvent consumption for this emissions unit shall not exceed 450 gallons per year based upon a rolling, 12-month summation of the monthly solvent consumption figures.
3. The permittee shall not employ any photochemically reactive materials in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total number of gallons of solvent used;
 - b. the total number of gallons of solvent recovered;
 - c. the total amount of solvent consumed (A.III.1.a minus A.III.1.b for the calendar month), in gallons;
 - d. the rolling, 12-month summation of the amount of solvent consumed, in gallons;
 - e. the total VOC emissions, in tons. This value shall be calculated as A.III.1.c multiplied by the density of the solvent, in pounds/gallon, divided by 2000; and
 - f. the rolling, 12-month summation of the total VOC emissions, in tons.
2. The permittee shall also maintain records for each liquid organic material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

3. The permit to install for emissions units K003 and P005 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 Toxic Policy") was applied for each pollutant emitted by these emissions units 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), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Methyl Ethyl Ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 3.52
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 151.0
 MAGLC (ug/m3): 14,048
- Pollutant: Toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 8.70
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 188
 MAGLC (ug/m3): 4476
4. 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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
 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
 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.)
5. If the permittee determines that the "Air Toxic 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
 a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- all exceedances of the rolling, 12-month VOC emission limitation; and
 - all exceedances of the rolling, 12-month solvent consumption limitation.
- The deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall also submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

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:
 VOC emissions shall not exceed 2.34 lbs/hr.
- Applicable Compliance Method:
 If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.
 None
- Emission Limitation:
 VOC emissions shall not exceed 1.51 tons/rolling, 12-month period.
- Applicable Compliance Method:
 Compliance shall be determined through the record keeping in Section C.1.
- Emission Limitation:
 The maximum annual cleanup solvent consumption for this emissions unit shall not exceed 450 gallons per year based upon a rolling, 12-month summation of the solvent consumption figures.

Applicable Compliance Method:

Compliance shall be determined through the record keeping in Section C.1.

2. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the solvents.

F. **Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A, B, C.1, C.2, D, E, and F