

Facility ID: 0125041960 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: 0125041960 Emissions Unit ID: R006 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>
Adhesive Spray Booth 6 with electric flash-off oven (plastic parts)	OAC rule 3745-31-05(C) (PTI 01-12155)	See sections A.2.a and B.1 below.
	OAC rule 3745-21-07(G)(2)	None. See section A.2.b below.
	OAC rule 3745-17-07(A)(1)(b)	See section A.2.c.
	OAC rule 3745-17-11(A)	See section A.2.c.
	OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT requirements)	See section A.2.d below.

**2. Additional Terms and Conditions**

- (a) Permit to Install 01-12155 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. The emissions of VOC from this emissions unit shall not exceed 8.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
  - i. The maximum annual usage for this emissions unit shall not exceed 3,000 gallons adhesive and 24 gallons of solvent based on a rolling, 12-month summation of monthly usages.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Maximum Allowable  
Month(s) Cumulative Coating Usage (gallons)

- 1 255
- 1-2 510
- 1-3 765
- 1-4 1020
- 1-5 1275
- 1-6 1530
- 1-7 1785
- 1-8 2040
- 1-9 2295
- 1-10 2550
- 1-11 2805
- 1-12 3000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in

this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5). The requirements established pursuant to these rules are not applicable because the process does not release particulate emissions (PE) into the ambient air. Facility-wide emissions shall not exceed 99.9 tons of VOC, 9.9 tons of individual hazardous air pollutant (HAP) emissions and 24.9 tons of total combined HAP emissions per rolling, 12-month period.

Facility-wide emissions shall be determined from a summation of monthly emissions from R002, R004, R006 and P001 and all emissions units that are permit by rule (OAC rule 3745-31-03), de minimis (OAC rule 3745-15-05) and/or exempt.

Therefore, the provisions for Title V permitting and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products (40 CFR part 63, subpart PPPP) will not be applicable.

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.

**B. Operational Restrictions**

1. This emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

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

1. The permittee shall collect and record the following information for booth 6 (R006) for each month during which adhesives are applied:
  - a. the company identification for each coating and cleanup material employed and whether or not the material is a photochemically reactive material;
  - b. the number of gallons of each coating and cleanup material employed in the booth;
  - c. the OC of each coating and cleanup material, in pounds per gallon;
  - d. the total OC emissions for all coatings and cleanup material, in pounds;
  - e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures;

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month; and

- f. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information during each month for the purpose of determining annual VOC and HAP emissions from emissions units R002, R004, R006, P001 and exempt and de minimus emissions unit:
  - a. the monthly VOC and HAP emission rate for all coatings and cleanup materials, in pounds from each of the above emissions units;
  - b. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the OC emissions from the previous 11 months) for all of the above emissions units;
  - c. the calculated individual HAP emission for the current month, in pounds or tons, for each of the above emissions units;
  - d. the calculated total HAP emissions for the current month, in pounds or tons, for each the above emissions units;
  - e. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units; and
  - f. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months) for all of the above emissions units.

3. The permit to install for emissions unit R006 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) 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: MEK

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.7 lbs/hr  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,502  
 MAGLC (ug/m3): 14,047

Pollutant: Toluene

TLV (mg/m3): 188  
 Maximum Hourly Emission Rate (lbs/hr): 1.6 lbs/hr  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,140  
 MAGLC (ug/m3): 4,476

Pollutant: Acetone

TLV (mg/m3): 1,780  
 Maximum Hourly Emission Rate (lbs/hr): 1.4 lbs/hr  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,796  
 MAGLC (ug/m3): 42,380

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:

- a. 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");
- 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 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic 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 Toxic Policy" for the change.
4. 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.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for any exceedance of the operating restrictions set forth in section A.2.a and A.2.c, above, that occurred during the previous three calendar months (January 1 through March 31, April 1 through June 30, July 1 through September 30, and October 1 through December 31) including:
  - a. all exceedances of the rolling, 12-month restriction on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels
  - b. the rolling, 12-month emission limitation for VOC from this emissions unit;
  - c. the facility-wide rolling, 12-month emission limitation for VOC;
  - d. the facility-wide rolling, 12-month emission limitation for individual HAPs; and
  - e. the facility-wide rolling, 12-month emission limitation for total, combined HAPs

These reports shall be submitted by April 15, July 15, October 15, and February 15 of each year and shall provide a summary of the record keeping required by sections C.1 for each reported exceedance.

2. The permittee shall notify the Central District Office 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 Central District Office within 30 days after the event occurs.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. and A.2 of these terms and conditions shall be determined in accordance with the following method.

**Emissions Limitation:**

The emissions of VOC from this emissions unit shall not exceed 8.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

**Applicable Compliance Method:**

Compliance with the annual VOC emission limit shall be determined by summing the monthly emissions for the calendar year, i.e., the value calculated in section C.1.f above.

The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10 (B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator 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 or 24A.

**Emissions Limitation:**

The maximum annual usage for this emissions unit shall not exceed 3,000 gallons adhesive and 24 gallons of solvent based on a rolling, 12-month summation of monthly usages.

**Applicable Compliance Method:**

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the calendar year, i.e., the value calculated in section C.1.e above.

**Emission Limitation**

Facility-wide emissions shall not exceed 9.9 of an individual HAP and 24.9 tons total combined HAPs per year, based upon a rolling, 12-month summation of the monthly emissions.

**Applicable Compliance Method**

Compliance shall be demonstrated by record keeping in section C.2.e and C.2.f, above.

**Emissions Limitation:**

Facility-wide emissions shall not exceed 99.9 tons of VOC per year, based upon a rolling, 12-month summation of the monthly emissions.

**Applicable Compliance Method:**

Compliance shall be demonstrated by record keeping in section C.2.b, above.

**F. Miscellaneous Requirements**

1. The terms and conditions in Sections A.1 through E.1 of this permit are federally enforceable.