

Facility ID: 0125042110 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 K003](#)  
[Go to Part II for Emissions Unit K004](#)  
[Go to Part II for Emissions Unit K010](#)

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Facility ID: 0125042110 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**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>
topcoat line for coating miscellaneous metal, with a natural gas oven for drying	OAC rule 3745-31-05(A)(3) (PTI 01-08631)	<p>Volatile organic compound (VOC) emissions shall not exceed 13.44 pounds per hour, excluding cleanup materials, and 59.4 tons per year, including cleanup materials.</p> <p>Particulate emissions from overspray shall not exceed 1.43 pounds per hour and 6.3 tons per year.</p> <p>See Section B.2 and Section B.3 below.</p>
	OAC rule 3745-35-07(B)	<p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(c), 3745-17-07(A)(1), and 3745-35-07(B).</p> <p>The total VOC emissions from K003, K004, and K010 shall not exceed 63.0 tons per rolling, 12-month period.</p> <p>The total HAP emissions from K003, K004, and K010 combined shall not exceed 15.0 tons per rolling, 12-month period.</p> <p>Individual HAP emissions from K003, K004, and K010 combined shall not exceed 7.0 tons per rolling, 12-month period.</p> <p>See Section B.1 below.</p>
	OAC rule 3745-21-09(U)(2)(c)	The VOC content of any coating employed in K003 shall not exceed 3.5 pounds per gallon.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from each stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule (based on Figure II) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-03(A)(3).

**2. Additional Terms and Conditions**

- (a) The 13.44 pounds per hour VOC limitation for this emissions unit was established to reflect potential to emit and show compliance with the Ohio EPA Air Toxics Policy. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

The 1.43 pounds per hour and 6.3 tons per year particulate emission limitations for this emissions unit were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, actual emissions calculated from coating and cleanup material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions. The permittee has existing records of the amount of coating and cleanup material employed in this emissions unit; therefore, the first year of monthly, accumulating, material usage limitations are not necessary.

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 28,571 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual cleanup material usage shall not exceed 120 gallons, based upon a rolling 12-month summation of the cleanup material usage figures.
2. The permittee shall vent all the emissions from the coatings through the dry filtration system at all times the emissions unit is in operation.
3. The permittee shall maintain a minimum stack test height of thirty six (36) feet, as measured from the ground to the top of the stacks, for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stacks.

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

1. The permittee shall collect and record the following information for this emissions unit on a monthly basis:
  - a. the name and company identification of each coating and cleanup material employed;
  - b. the VOC content of each coating employed, excluding water and exempt solvents, as applied, in pounds per gallon;
  - c. the VOC content of each cleanup material employed, in pounds per gallon;
  - d. the individual HAP content of each coating, or cleanup material, in pounds per gallon;
  - e. the number of gallons of each coating and cleanup material employed;
  - f. the number of gallons of each cleanup material drummed for shipment off site;
  - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons (i.e., [(for all coatings, the sum of (b) x (e)) + (for all cleanup materials, the sum of (c) x (e)) - (for all cleanup materials drummed for shipment off site, (c) x (f)) / 2000];
  - h. the total HAP emissions from all coatings and cleanup material employed, in pounds or tons; and
  - i. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining compliance with the rolling, 12-month limitations:
  - a. the rolling, 12-month coatings usage in this emissions unit, in gallons;
  - b. the rolling, 12-month cleanup materials usage in this emissions unit, in gallons;
  - c. the VOC emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined;
  - d. the rolling, 12-month VOC emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined;
  - e. the rolling, 12-month individual HAP emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined; and
  - f. the rolling, 12-month total HAP emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined.
3. The permit to install for this emissions unit (K003) 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: 1,2,4 Trimethyl Benzene  
 TLV (ug/m3): 123,000  
 Maximum Hourly Emission Rate (lbs/hr): 13.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1744.5  
 MAGLC (ug/m3): 2928

Pollutant: 2-Methoxyethyl Acetate  
 TLV (ug/m3): 24,000  
 Maximum Hourly Emission Rate (lbs/hr): 4.07  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 528.3  
 MAGLC (ug/m3): 571

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

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 filters were not in service and the emissions unit was in operation.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following:
  - a. the rolling, 12-month coating usage limitation for this emissions unit (28,571 gallons);
  - b. the rolling, 12-month cleanup material usage limitation for this emissions unit (120 gallons);
  - c. the rolling, 12-month VOC emission limitation for K003, K004, and K010, combined (63.0 tons);
  - d. the rolling, 12-month individual HAP emission limitation for K003, K004, and K010, combined (7.0 tons); and
  - e. the rolling, 12-month total HAP emission limitation for K003, K004, and K010, combined (15.0 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of each monthly record showing the use of noncomplying coatings (i.e., VOC contents greater than 3.5 pounds VOC/gallon, excluding water and exempt solvents). Each notification shall include a copy of the record and be sent to Ohio EPA, Central District Office within 30 days after the violation occurs.
3. The permittee shall submit annual reports which specify the total VOC individual HAPs (over one ton) and total HAP emissions, in tons, from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA, Central District Office by April 15 of each year.
4. The permittee shall notify the Ohio EPA, Central District Office in writing of each daily record showing that the dry filtration system was not in service when the emissions unit was in operation. Each notification shall include a copy of the record and be sent to Ohio EPA, Central District Office within 30 days after the violation occurs.

#### E. Testing Requirements

1. Compliance with emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
Particulate emissions from overspray shall not exceed 1.43 pounds per hour and 6.3 tons per year.

Applicable Compliance Method:

Compliance with the hourly particulate emission limitation may be determined by multiplying the maximum density of the coating material employed (pound per gallon) by the solids content (weight fraction) and the maximum usage in one hour (3.84 gallons per hour). The result shall be multiplied by the transfer efficiency of 40% (i.e., 1-0.4) and the control efficiency rate of the filter of 90% (i.e., 1-0.9). The transfer and control efficiencies were provided by the permittee in the permit-to-install application for this emissions unit received by the Ohio EPA, Central District Office on July 15, 2002.

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 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the

Ohio EPA.

The annual limitation was developed by multiplying the hourly emission limitation by the maximum annual hours of operation of 8,760 and dividing by 2000 lbs/ton. Compliance with the annual emission limitation may be assumed provided that the permittee complies with the hourly particulate emission limitation.

Emission Limitation:

VOC emissions shall not exceed 13.44 pounds per hour, excluding cleanup materials.

Applicable Compliance Method:

Compliance with the hourly VOC limitation may be demonstrated by multiplying the maximum allowable VOC content of the coating material (in pounds of VOC per gallon including water and exempt solvents) by the maximum usage in one hour (3.84 gallons).

Emission Limitation:

VOC emissions shall not exceed 59.4 tons per year, including cleanup materials.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation may be demonstrated through the monthly record keeping, as specified in Section C.1.g above. The annual emission rate may be determined by summing the monthly VOC emissions for the 12 months of the calendar year.

Emission Limitation:

The total VOC emissions from K003, K004, and K010 shall not exceed 63.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limit shall be demonstrated through the 12-month, rolling record keeping specified in Section C.2.d above.

Emission Limitation:

The VOC content of any coating employed in K003 shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limit shall be demonstrated through record keeping specified in Section C.1.b above.

Emission Limitation:

Visible particulate emissions from each stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

Emission Limitations:

The total HAP emissions from K003, K004, and K010, combined shall not exceed 15.0 tons per rolling, 12-month period.

Individual HAP emissions from K003, K004, and K010, combined shall not exceed 7.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limit shall be demonstrated through the 12-month, rolling recordkeeping specified in Sections C.2.d and e above.

2. The VOC content of the coatings and cleanup materials shall be determined according to OAC rule 3745-21-10 (B). USEPA Method 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 U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Note: Method 24 data may be supplied by the coating manufacturer.

#### 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.1-2, E and F.

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Facility ID: 0125042110 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

#### 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>
repair spray booth for coating miscellaneous metal parts	OAC rule 3745-31-05(A)(3) (PTI 01-4050)	Volatile organic compound (VOC) emissions shall not exceed 5.43 pounds per hour, excluding cleanup materials, and 12.6 tons per year, including cleanup materials.  See Section B.1. below.  The VOC content of each coating employed in this emissions unit shall not exceed 6.91 pounds per gallon.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U), 3745-17-07(A)(1), 3745-17-11(B), and 3745-35-07(B). The total VOC emissions from K003, K004, and K010 shall not exceed 63.0 tons per rolling, 12-month period.  The total HAP emissions from K003, K004, and K010 combined shall not exceed 15.0 tons per rolling, 12-month period.  Individual HAP emissions from K003, K004, and K010 combined shall not exceed 7.0 tons per rolling, 12-month period.  See Section B.1 below.
	OAC rule 3745-35-07(B)	See Section A.2.a below. Visible particulate emissions from each stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. Particulate emissions shall not exceed 0.551 pounds/hour, based on Table I (Figure II does not apply because the uncontrolled rate of emissions is less than 10 pounds/hour).
	OAC rule 3745-21-09(U)(1) OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(B)	

**2. Additional Terms and Conditions**

- (a) Pursuant to OAC rule 3745-21-09(U)(2)(e)(ii), this emissions unit is exempt from the limits specified in OAC rule 3745-21-09(U) because the unit's maximum daily usage is less than 10 gallons. The 5.43 pounds per hour VOC limitation for this emissions unit was established to reflect the potential to emit and show compliance with the Ohio EPA Air Toxics Policy. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, actual emissions calculated from coating and cleanup material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions. The permittee has existing records of the amount of coating and cleanup material employed in this emissions unit; therefore, the first year of monthly, accumulating, material usage limitations are not necessary.

**B. Operational Restrictions**

1. The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit.
2. The maximum annual coating usage for this emissions unit shall not exceed 3,650 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual cleanup material usage for this emissions unit shall not exceed 60 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.
3. The permittee shall vent all the emissions from the coatings through the dry filtration system at all times the emissions unit is in operation.

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

1. The permittee shall collect and record the following information on a daily basis:
  - a. the name and identification of each type of coating employed;
  - b. the number of gallons of each type of coating employed; and
  - c. the total number of gallons of all coatings employed.
2. The permittee shall collect and record the following information for this emissions unit on a monthly basis:

- a. the name and company identification of each coating and cleanup material employed;
  - b. the VOC content of each coating employed, as applied, in pounds per gallon;
  - c. the VOC content of each cleanup material, in pounds per gallon;
  - d. the individual HAP content of each coating and cleanup material, in pounds per gallon;
  - e. the number of gallons of each coating and cleanup material employed;
  - f. the number of gallons of each cleanup material drummed for shipment off site;
  - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons (i.e., [(for all coatings, the sum of (b) x (e)) + (for all cleanup materials, the sum of (c) x (e)) - (for all cleanup materials drummed for shipment off site, (c) x (f)) / 2000];
  - h. the total HAP emissions from all coatings and cleanup material employed, in pounds or tons; and
  - i. the total emissions of each individual HAP from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information on a monthly basis for the purpose of determining compliance with the rolling, 12-month limitations:
  - a. the rolling, 12-month coatings usage in this emissions unit, in gallons;
  - b. the rolling, 12-month cleanup materials usage in this emissions unit, in gallons;
  - c. the VOC emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined;
  - d. the rolling, 12-month VOC emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined;
  - d. the rolling, 12-month individual HAP emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined; and
  - e. the rolling, 12-month total HAP emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined.
4. The permit to install for this emissions unit (K004) 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: cyclohexanone  
 TLV (ug/m<sup>3</sup>): 100  
 Maximum Hourly Emission Rate (lbs/hr): 0.71  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 44.53  
 MAGLC (ug/m<sup>3</sup>): 2380

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.

5. The permittee shall maintain daily records that document any time periods when the dry filtration filters were not in service and the emissions unit was in operation.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following:
- the rolling, 12-month coating usage limitation for this emissions unit (3,650 gallons);
  - the rolling, 12-month cleanup material usage limitation for this emissions unit (60 gallons);
  - the rolling 12-month VOC emission limitation for K003, K004, and K010, combined (63.0 tons);
  - the rolling, 12-month individual HAP emission limitation for K003, K004, and K010, combined (7.0 tons); and
  - the rolling, 12-month total HAP emission limitation for K003, K004, and K010, combined (15.0 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of each daily record showing that the ten gallon coating usage limitation was exceeded for this emissions unit. The notification shall include a copy of such record and be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports which specify the total VOC individual HAPs (over one ton) and total HAP emissions, in tons, from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA, Central District Office by April 15 of each year.
4. The permittee shall notify the Ohio EPA, Central District Office in writing of each daily record showing that the dry filtration system was not in service when the emissions unit was in operation. Each notification shall include a copy of the record and be sent to Ohio EPA, Central District Office within 30 days after the violation occurs.

**E. Testing Requirements**

1. Compliance with the emission limitations in Part II.A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

VOC emissions shall not exceed 5.43 pounds per hour, excluding cleanup materials.

Applicable Compliance Method:

Compliance with the hourly VOC emission limit was developed by multiplying the maximum VOC content of the coating material (5.43 pounds of VOC per gallon per permit application) by the maximum usage in one hour (1 gallon).

Emission Limitation:

VOC emissions shall not exceed 12.6 tons per year, including cleanup materials.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated through the monthly record keeping specified in Section C.2.g above. The annual emission rate may be determined by summing the monthly VOC emissions for 12 months of the calendar year.

Emission Limitation:

The total VOC emissions from K003, K004, and K010 shall not exceed 63.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limit shall be demonstrated through the 12-month, rolling record keeping specified in Section C.3.d above.

Emission Limitation:

The VOC content of any coating employed shall not exceed 6.91 pounds per gallon.

Applicable Compliance Method:

Compliance with the VOC content limit shall be demonstrated through record keepingspecified in Section C.2.b. above.

Emission Limitations:

The total HAP emissions from K003, K004, and K010 combined shall not exceed 15.0 tons per rolling, 12-month period.

Individual HAP emissions from K003, K004, and K010 combined shall not exceed 7.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limit shall be demonstrated through the 12-month, rolling record keeping specified in Sections C.3.d and e above.

Emission Limitation:

Particulate emissions shall not exceed 0.551 pounds/hour

Applicable Compliance Method:

Compliance with the hourly particulate emission limitation may be determined by multiplying the maximum density of the coating material employed (pound per gallon) by the solids content (weight fraction) and the maximum usage in one hour (0.81 gallon per hour). The result shall be multiplied by the transfer efficiency of 40% (i.e., 1-0.4) and the control efficiency rate of the filter of 90% (i.e., 1-0.9). The transfer and control efficiencies were provided by the permittee in the permit-to-operate application for this emissions unit received by the Ohio EPA, Central District Office on November 6, 2002.

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 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2. The VOC content of the coatings and cleanup materials shall be determined according to OAC rule 3745-21-10 (B). USEPA Method 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 U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Note: Method 24 data may be supplied by the coating manufacturer.

**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.1-3, E, and F.

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

Facility ID: 0125042110 Emissions Unit ID: K010 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**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>
powder coating line for coating miscellaneous metal, with a natural gas oven for drying	OAC rule 3745-31-05(A)(3) (PTI 01-08316)	Particulate emissions shall not exceed 1.0 pound per hour and 0.7 ton per year.  See Section A.2.a. below.  Volatile organic compound (VOC) emissions shall not exceed 7.2 pounds per hour and 1.4 tons per year, including emissions from cleanup materials.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-17-07(A).
	OAC rule 3745-35-07(B)	The total VOC emissions from K003, K004, and K010 shall not exceed 63.0 tons per rolling, 12-month period.  The total HAP emissions from K003, K004, and K010 combined shall not exceed 15.0 tons per rolling, 12-month period.  Individual HAP emissions from K003, K004, and K010 combined shall not exceed 7.0 tons per rolling, 12-month period.  See Section B.1 below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A)	See Section A.2.c below. Visible particulate emissions from each stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- (a) The VOC emissions from this emission unit are generated by the cleanup material and powder coating material. Therefore, the requirements of OAC rule 3745-21-09(U) do not apply. The 1.0 pound of particulate emissions per hour 7.2 pounds of VOC emissions per hour limitations for this emissions unit were established to reflect the the hourly potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

To avoid the emission limitation/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive 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). To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, actual emissions calculated from coating and cleanup material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions. The permittee has existing records of the amount of coating and cleanup material employed in this emissions unit; therefore, the first year of monthly, accumulating, material usage limitations are not necessary.

**B. Operational Restrictions**

1. The permittee shall vent all the emissions from the coatings through the dry filtration system at all times the emissions unit is in operation.
2. The maximum annual powder coating usage for this emissions unit shall not exceed 180,000 pounds, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual cleanup material usage shall not exceed 300 gallons based upon a rolling 12-month summation of the cleanup material usage figures.

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

1. The permittee shall collect and record the following information for this emissions unit on a monthly basis:
  - a. the name and identification of each powder coating and cleanup material employed;
  - b. an identification of whether or not the cleanup material is photochemically reactive;
  - c. the VOC content of each powder coating and cleanup material, in pounds per gallon or pounds per pound;
  - d. the solids content of each powder coating material;
  - e. the individual HAP content of each coating and cleanup material, in pounds per gallon;
  - f. the number of pounds or gallons of each powder coating and cleanup material employed;
  - g. the number of gallons of each cleanup material drummed for shipment off site;
  - h. the total VOC emissions for all powder coating and cleanup materials employed, in pounds or tons (i.e., [(for all coatings, the sum of (b) x (e)) + (for all cleanup materials, the sum of (c) x (e)) - (for all cleanup materials drummed for shipment off site, (c) x (f)) / 2000];
  - i. the total particulate emissions for all powder coating materials employed, pounds or tons (i.e., (d) x (f));
  - j. the total HAP emissions from all coatings and cleanup material employed, in pounds or tons; and
  - k. the total emissions of each individual HAP from all coatings and cleanup material employed, in pounds or tons.
2. The permittee shall collect and record the following information on a monthly basis for the purpose of determining compliance with the rolling, 12-month limitations:
  - a. the rolling, 12-month coatings usage in this emissions unit, in gallons;
  - b. the rolling, 12-month cleanup materials usage in this emissions unit, in gallons;
  - c. the VOC emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined;
  - d. the rolling, 12-month VOC emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined;
  - e. the rolling, 12-month individual HAP emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined; and
  - f. the rolling, 12-month total HAP emissions from all coatings and cleanup materials employed in K003, K004, and K010, combined.
3. The permittee shall maintain daily records that document any time periods when the dry filtration filters were not in service and the emissions unit was in operation.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing an exceedance of the following:
  - a. the rolling, 12-month coating usage limitation for this emissions unit (180,000 pounds);
  - b. the rolling, 12-month cleanup material usage limitation for this emissions unit (300 gallons);

- c. the rolling, 12-month VOC emission limitation for K003, K004, K010, combined (63.0 tons);
  - d. the rolling, 12-month individual HAP emission limitation for K003, K004, and K010, combined (7.0 tons); and
  - e. the rolling, 12-month total HAP emission limitation for K003, K004, and K010 combined (15.0 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions.

- 2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material was employed in this emissions unit. These reports shall be submitted to Ohio EPA, Central District Office within 30 days after the event occurs.
- 3. The permittee shall submit annual reports which specify the total VOC individual HAPs (over one ton) and total HAP emissions, in tons, from this emissions unit for the previous calendar year. The reports shall be submitted to the Ohio EPA, Central District Office by April 15 of each year.
- 4. The permittee shall notify the Ohio EPA, Central District Office in writing of each daily record showing that the dry filtration system was not in service when the emissions unit was in operation. Each notification shall include a copy of the record and be sent to Ohio EPA, Central District Office within 30 days after the violation occurs.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
Particulate emissions shall not exceed 1.0 pound per hour.

**Applicable Compliance Method:**

Compliance with the hourly particulate emission limit may be determined by multiplying the maximum coating usage in one hour (120 pounds, assuming 100% solids content) by the transfer efficiency rate of 60% (i.e., 1-0.6) and the filter control efficiency rate of 98% (i.e., 1-0.98). The transfer and control efficiencies were provided by the permittee in the permit-to-install application for this emissions unit received by the Ohio EPA, Central District Office on December 29, 2000.

**Emission Limitation:**

Particulate emissions shall not exceed 0.7 tons per year.

**Applicable Compliance Method:**

Compliance with the annual particulate limit shall be demonstrated through the monthly record keeping as specified in Section C.1.i above. The annual emission rate may be determined by summing the monthly VOC emissions for the 12 months of the calendar year.

**Emission Limitation:**

VOC emissions shall not exceed 7.2 pounds per hour, including emissions from cleanup materials.

**Applicable Compliance Method:**

Compliance with hourly VOC emission limit may be determined by summing the VOC emissions from the powder coating (the maximum hourly coating usage, in pounds, multiplied by pounds of VOC per pound of coating) and the VOC emissions from any cleanup material employed (VOC content of cleanup, in pounds per gallon, multiplied by the maximum hourly usage of 1 gallon).

**Emission Limitation:**

VOC emissions shall not exceed 1.4 tons per year, including cleanup materials.

**Applicable Compliance Method:**

Compliance with the annual VOC limit shall be demonstrated through the monthly record keeping as specified in Section C.1.h. above. The annual emission rate may be determined by summing the monthly VOC emissions for the 12 months of the calendar year.

**Emission Limitation:**

Visible particulate emissions from each stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

**Applicable Compliance Method:**

If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

**Emission Limitation:**

The total VOC emissions from K003, K004, and K010 shall not exceed 63.0 tons per rolling, 12-month period.

**Applicable Compliance Method:**

Compliance with this limit shall be demonstrated through the 12-month, rolling record keeping specified in Section C.2.c. above.

**Emission Limitations:**

The total HAP emissions from K003, K004, and K010, combined shall not exceed 15.0 tons per rolling, 12-month period.

Individual HAP emissions from K003, K004, and K010, combined shall not exceed 7.0 tons per rolling, 12-month period.

**Applicable Compliance Method:**

Compliance with this limit may be demonstrated through the 12-month, rolling recordkeeping, as specified in Sections C.2.d and 2.e above.

- 2. The VOC content of the coatings and cleanup materials shall be determined according to OAC rule 3745-21-10 (B). USEPA Method 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 U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Note: Method 24 data may be supplied by the coating manufacturer.

**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-E and F.1.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.