

Facility ID: 0125042425 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](#)

[Go to Part II for Emissions Unit K002](#)

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

Facility ID: 0125042425 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>
large spray booth for staining wood cabinets	OAC rule 3745-21-07 (G)(2)	Organic compound emissions shall not exceed 40 lbs per day, see A.2.a
	OAC rule 3745-31-05 (A)(3) PTI 01-08088	Organic compound emissions shall not exceed 5.0 lbs/hr from adhesives only and 5.0 tons/yr, including emissions from cleanup. See A.2.b.

**2. Additional Terms and Conditions**

- (a) The hourly emission limitation from this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). The hourly emission limitation was established to reflect the potential to emit for K001. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

**B. Operational Restrictions**

1. The emissions unit will be operated and maintained in accordance with the manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturers 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.
2. All coating operations causing air emissions, including operations outside of the spray booth, shall occur only when the exhaust fans of the spray booth are operating.
3. The total coating usage shall not exceed 10 gallons in any day.

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

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. The company identification for each coating and photochemically reactive cleanup material employed.
  - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
  - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
  - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d/e), in pounds per hour (average).

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

the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record each month the following information for the purpose of determining annual organic compound emissions:
  - a. The company identification for each nonphotochemically reactive cleanup material employed.
  - b. The number of gallons of each nonphotochemically reactive cleanup material employed.
  - c. The organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon.
  - d. The total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds.
3. The permittee shall calculate and record the total OC emissions each year (the annual OC emissions shall be calculated by summing the monthly OC emissions from sections C.1.e and C.2.d for the calendar year), in tons, for this emissions unit.
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. 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 deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 5 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. If the annual emission limit of 5.0 tons per year of VOC is exceeded at any time within the calendar year, the permittee shall submit an emissions report which specifies the total VOC emissions from this emissions unit and the period of time the exceedance occurred. This report shall be submitted within 30 days after the deviation occurs.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:  
Emission Limitations: 5 lbs OC/hr from adhesives only  
  
Applicable Compliance Method: Compliance with the maximum hourly OC emission limitation (potential to emit) shall be determined as follows:  
  
Multiply the maximum coating usage rate (gallon/hr) by the maximum OC content of all the coatings employed (lbs OC/gallon of coating).  
  
 $0.71 \text{ gallon/hr} * 2.80 \text{ lbs OC/gal} + 0.61 \text{ gallon/hr} * 3.27 \text{ lbs OC/gallon} + 0.27 \text{ gallon/hr} * 3.71 \text{ lbs OC/gallon} = 5.0 \text{ lbs OC/hr}$   
Emission Limitations: 40 lbs OC/day  
  
Applicable Compliance Method: The record keeping requirements in Section C.1. of this permit shall be used to determine compliance with this emission limitation.  
Emission Limitations: 5 tons OC/yr including emissions from cleanup  
  
Applicable Compliance Method: The record keeping requirements in Section C.3 of this permit shall be used to determine compliance with the above limitation.
2. Formulation data shall be used to determine the organic compound content of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. Air Toxic Policy Clarifying Language  
  
Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0125042425 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
large spray booth for staining wood cabinets	OAC rule 3745-21-07 (G)(2)	None (see B.1.)
	OAC rule 3745-31-05 (A)(3) PTI 01-08088	Organic compound emissions shall not exceed 5.0 lbs/hr from adhesives only and 5.0 tons/yr, including emissions from cleanup. See A.2.b.

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

**B. Operational Restrictions**

1. The permittee shall not employ any adhesive in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall record the following information each month for this emissions unit:
  - a. the name and identification number of each adhesive employed;
  - b. the OC content of each adhesive, in pounds/gallon and in pounds/gallon excluding water and exempt solvents;
  - c. the number of gallons of each adhesive employed;
  - d. the total number of gallons of all adhesives employed; and
  - e. the total emissions of OC from all adhesives employed, in pounds
2. The permittee shall record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, in pounds/gallon;
  - c. the number of gallons of each cleanup material employed; and
  - d. the total emissions of OC from all cleanup materials employed, in pounds.
3. The permittee shall calculate and record the total OC emissions each year. The annual OC emissions shall be calculated by summing the monthly OC emissions from sections C.1.e and C.2.d for the calendar year, in tons, for this emissions unit.
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. 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 collect and record the following information for each day for the coating operation when using photochemically reactive material:
  - a. The company identification for each coating and photochemically reactive cleanup material employed.
  - b. The number of gallons of each coating and photochemically reactive cleanup material employed.

- c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
- d. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
- e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
- f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which photochemically reactive materials were applied to non-metal parts and the average hourly organic compound emissions from the coatings, and photochemically reactive cleanup materials exceeded 5 pounds per hour and the actual average hourly organic compound emissions for each such day;
  - b. an identification of each day during which photochemically reactive materials were applied to non-metal parts and the organic compound emissions from the coatings, and photochemically reactive cleanup materials exceeded 40 pounds per day and the actual organic compound emissions for each such day; and
  - c. an identification of any daily record showing more than 10 gallons of coatings applied to metal parts in the spray booth.
2. If the annual emission limit of 5.0 tons per year of VOC is exceeded at any time within the calendar year, the permittee shall submit an emissions report which specifies the total VOC emissions from this emissions unit and the period of time the exceedance occurred. This report shall be submitted within 30 days after the deviation occurs.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:  
Emission Limitations: 5 lbs OC/hr from adhesives only  
  
Applicable Compliance Method: Compliance with the maximum hourly OC emission limitation (potential to emit) shall be determined as follows:  
  
Multiply the maximum adhesive usage rate (1 gallon/hr) by the maximum OC content of all the coatings employed (5.0 lbs OC/gallon of adhesive). This hourly limit is the potential to emit for the emissions unit therefore, no record-keeping and reporting requirements are necessary to demonstrate compliance.  
Emission Limitations: 5 tons OC/yr including emissions from cleanup  
  
Applicable Compliance Method: The record keeping requirements in Section C.3 of this permit shall be used to determine compliance with this emission limitation.
2. Formulation data shall be used to determine the organic compound content of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. Air Toxic Policy Clarifying Language  
  
Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.