

Facility ID: 0125042494 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](#)
- [Go to Part II for Emissions Unit K003](#)
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Facility ID: 0125042494 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>
automotive priming booth 1 vented to filter	OAC rule 3745-31-05(A)(3) (PTI 01-08530)	Volatile organic compound (VOC) emissions shall not exceed 9.9 pounds per hour, excluding cleanup, and 0.7 ton per year, including cleanup.
	OAC rule 3745-21-09(U)(1)	See sections A.2.a and B.1. below. Exempt per OAC rule 3745-21-09(U)(2)(c).

2. **Additional Terms and Conditions**
 - (a) The 9.9 lbs VOC/hr limitation was established to reflect the hourly potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The permittee shall minimize solvent evaporation by storing waste solvents and coatings in covered containers.
4. The maximum annual coating usage for this emissions unit shall not exceed 200 gallons primer.
5. The maximum annual clean-up solvent usage for this emissions unit shall not exceed 24 gallons.
6. The maximum annual gun cleaner solvent usage for all emissions unit shall not exceed 10 gallons.
7. The maximum annual DX330 cleaner solvent usage shall not exceed 18 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
 - a. The name and identification of each type of coating and cleanup material employed.
 - b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
 - c. The VOC content of each type of cleanup material, in pounds per gallon.
 - d. The number of gallons of each type of coating and cleanup material employed.

- e. The number of gallons of each type of cleanup material drummed for shipment off-site.
- f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons. i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).

The annual emission rate shall be determined by dividing the total VOC emissions by 2,000 pounds per ton, i.e. (f) / 2,000.

- 2. 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.
- 3. The permit to install for these emissions units (K001, K002, K003, K004 and K005) 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 this emissions unit 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). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 3.18
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 266
 MAGLC (ug/m3): 4,476

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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 its 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

D. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Central District Office (CDO) by January 31 of each year.
- 2. The permittee shall notify CDO 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 CDO within 30 days after the event occurs.

E. Testing Requirements

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

Emission Limitations:
 VOC emissions shall not exceed 9.9 lbs/hr and 0.7 ton/yr.

Applicable Compliance Method:
 Compliance with the hourly emission limitation shall be demonstrated by multiplying the coating content, 5.2 lbs VOC/gal, by the maximum coating applied per hour, 1.9 gals/hr, equals 9.9 lbs VOC/hr.

Compliance with the annual emission limitation shall be demonstrated by summing the the number of gallons applied per year, as determined through record keeping in section C 1 (200 gals/yr), multiplied by the corresponding VOC content, 5.2 lbs VOC/gal primer, divided by 2,000 lbs/ton would yield 0.52 tons VOC/y;

plus, 6.9 lbs VOC/gal clean-up* 10 gals/yr * 1 ton/2,000 lbs = 0.08 VOC/yr; plus, 6.6 lbs VOC/gal gun cleaner* 24 gals/yr * 1 ton/2,000 lbs = 0.03 VOC/yr; plus, 6.4 lbs VOC/gal DX330 cleaner * 18 gals/yr * 1 ton/2,000 lbs = 0.06 tons/yr.

F. Miscellaneous Requirements

1. None

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Facility ID: 0125042494 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>
automotive priming booth 2 vented to filter	OAC rule 3745-31-05(A)(3) (PTI 01-08530)	Volatile organic compound (VOC) emissions shall not exceed 9.9 pounds per hour, excluding cleanup, and 0.7 ton per year, including cleanup.
	OAC rule 3745-21-09(U)(1)	See sections A.2.a and B.1. below. Exempt per OAC rule 3745-21-09(U)(2)(c).

2. Additional Terms and Conditions

- (a) The 9.9 lbs VOC/hr limitation was established to reflect the hourly potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The permittee shall minimize solvent evaporation by storing waste solvents and coatings in covered containers.
4. The maximum annual coating usage for this emissions unit shall not exceed 200 gallons primer.
5. The maximum annual clean-up solvent usage for this emissions unit shall not exceed 24 gallons.
6. The maximum annual gun cleaner solvent usage for all emissions unit shall not exceed 10 gallons.
7. The maximum annual DX330 cleaner solvent usage shall not exceed 18 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
 - a. The name and identification of each type of coating and cleanup material employed.
 - b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
 - c. The VOC content of each type of cleanup material, in pounds per gallon.
 - d. The number of gallons of each type of coating and cleanup material employed.
 - e. The number of gallons of each type of cleanup material drummed for shipment off-site.

- f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons. i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).

The annual emission rate shall be determined by dividing the total VOC emissions by 2,000 pounds per ton, i.e. (f) / 2,000.

2. 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.
3. The permit to install for these emissions units (K001, K002, K003, K004 and K005) 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 this emissions unit 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). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 3.18
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 266
 MAGLC (ug/m3): 4,476

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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 its 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

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Central District Office (CDO) by January 31 of each year.
2. The permittee shall notify CDO 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 CDO within 30 days after the event occurs.

E. Testing Requirements

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

Emission Limitations:
 VOC emissions shall not exceed 9.9 lbs/hr and 0.7 ton/yr.

Applicable Compliance Method:
 Compliance with the hourly emission limitation shall be demonstrated by multiplying the coating content, 5.2 lbs VOC/gal, by the maximum coating applied per hour, 1.9 gals/hr, equals 9.9 lbs VOC/hr.

Compliance with the annual emission limitation shall be demonstrated by summing the the number of gallons applied per year, as determined through record keeping in section C 1 (200 gals/yr), multiplied by the corresponding VOC content, 5.2 lbs VOC/gal primer, divided by 2,000 lbs/ton would yield 0.52 tons VOC/yr; plus, 6.9 lbs VOC/gal clean-up* 10 gals/yr * 1 ton/2,000 lbs = 0.08 VOC/yr; plus, 6.6 lbs VOC/gal gun cleaner*

24 gals/yr * 1 ton/2,000 lbs = 0.03 VOC/yr: plus, 6.4 lbs VOC/gal DX330 cleaner * 18 gals/yr * 1 ton/2,000 lbs = 0.06 tons/yr.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 0125042494 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>
automotive coating booth 1 with oven vented to filter	OAC rule 3745-31-05(A)(3) (PTI 01-08530)	Volatile organic compound (VOC) emissions shall not exceed 11.9 pounds per hour, excluding cleanup and 4.4 tons per year, including cleanup.
	OAC rule 3745-21-09(U)(1)	See sections A.2.a and B.1. below. Exempt per OAC rule 3745-21-09(U)(2)(c).

2. Additional Terms and Conditions

- (a) The 11.9 lbsVOC/hr limitation was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- 2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
- 3. The permittee shall minimize solvent evaporation by storing waste solvents and coatings in covered containers.
- 4. The maximum annual basecoat usage for this emissions unit shall not exceed 1,120 gallons.
- 5. The maximum annual clearcoat usage for this emissions unit shall not exceed 360 gallons.
- 6. The maximum annual clean-up solvent usage for this emissions unit shall not exceed 24 gallons.
- 7. The maximum annual DX103 solvent usage for this emissions unit shall not exceed 6 gallons.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
 - a. The name and identification of each type of coating and cleanup material employed.
 - b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
 - c. The VOC content of each type of cleanup material, in pounds per gallon.
 - d. The number of gallons of each type of coating and cleanup material employed.
 - e. The number of gallons of each type of cleanup material drummed for shipment off-site.

- f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).

The annual emission rate shall be determined by dividing the total VOC emissions by 2,000 pounds per ton, i.e. (f) / 2,000.

2. 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.
3. The permit to install for these emissions units (K001, K002, K003, K004 and K005) 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 this emissions unit 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). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 2.637
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 266
 MAGLC (ug/m3): 4,476

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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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.).

4. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 its 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" fo

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Central District Office (CDO) by January 31 of each year.
2. The permittee shall notify the Ohio EPA, CDO 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 CDO within 30 days after the event occurs.

E. Testing Requirements

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

Emission Limitations:
 VOC emissions shall not exceed 11.9 lbs/hr and 4.4 tons/yr.

Applicable Compliance Method:
 Compliance with the hourly emission limitation shall be demonstrated by multiplying the coating content, 6.3 lbs VOC/gal, by the maximum coating applied per hour, 1.9 gals/hr, equals 11.9 lbs VOC/hr.

Compliance with the annual emission limitation shall be demonstrated by summing the the number of gallons applied per year, as determined through record keeping in section C 1 (1,100 gals/yr), multiplied by the corresponding VOC content, 6.3 lbs VOC/gal base coat, divided by 2,000 lbs/ton would yield 3.46 tons VOC/yr; plus, 5 lbs VOC/gal base coat * 20 gals/yr * 1 ton/2,000 lbs = 0.05 tons VOC/yr; plus, 4.6 lbs VOC/gal clear coat * 360 gals/yr * 1 ton/2,000 lbs = 0.82 tons VOC/yr; plus, 6.9 lbs VOC/gal cleaner * 24 gals/yr * 1 ton/2,000 lbs =

0.08 tons VOC/yr; plus, 6.5 lbs VOC/gal cleaner * 6 gals/yr * 1 ton/2,000 lbs = 0.02 tons VOC/yr.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 0125042494 Emissions Unit ID: K004 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>
automotive coating booth 2 with oven vented to filter	OAC rule 3745-31-05(A)(3) (PTI 01-08530)	Volatile organic compound (VOC) emissions shall not exceed 11.9 pounds per hour, excluding cleanup and 4.4 tons per year, including cleanup.
	OAC rule 3745-21-09(U)(1)	See sections A.2.a and B.1. below. Exempt per OAC rule 3745-21-09(U)(2)(c).

- 2. **Additional Terms and Conditions**
 - (a) The 11.9 lbsVOC/hr limitation was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- 2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
- 3. The permittee shall minimize solvent evaporation by storing waste solvents and coatings in covered containers.
- 4. The maximum annual basecoat usage for this emissions unit shall not exceed 1,120 gallons.
- 5. The maximum annual clearcoat usage for this emissions unit shall not exceed 360 gallons.
- 6. The maximum annual clean-up solvent usage for this emissions unit shall not exceed 24 gallons.
- 7. The maximum annual DX103 solvent usage for this emissions unit shall not exceed 6 gallons.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
 - a. The name and identification of each type of coating and cleanup material employed.
 - b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
 - c. The VOC content of each type of cleanup material, in pounds per gallon.
 - d. The number of gallons of each type of coating and cleanup material employed.
 - e. The number of gallons of each type of cleanup material drummed for shipment off-site.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons. i.e., the sum of

all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).

The annual emission rate shall be determined by dividing the total VOC emissions by 2,000 pounds per ton, i.e. (f) / 2,000.

2. 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.
3. The permit to install for these emissions units (K001, K002, K003, K004 and K005) 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 this emissions unit 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). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 2.637
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 266
 MAGLC (ug/m3): 4,476

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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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.).

4. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 its 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" fo

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Central District Office (CDO) by January 31 of each year.
2. The permittee shall notify the Ohio EPA, CDO 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 CDO within 30 days after the event occurs.

E. Testing Requirements

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

Emission Limitations:
 VOC emissions shall not exceed 11.9 lbs/hr and 4.4 tons/yr.

Applicable Compliance Method:
 Compliance with the hourly emission limitation shall be demonstrated by multiplying the coating content, 6.3 lbs VOC/gal, by the maximum coating applied per hour, 1.9 gals/hr, equals 11.9 lbs VOC/hr.

Compliance with the annual emission limitation shall be demonstrated by summing the the number of gallons applied per year, as determined through record keeping in section C 1 (1,100 gals/yr), multiplied by the corresponding VOC content, 6.3 lbs VOC/gal base coat, divided by 2,000 lbs/ton would yield 3.46 tons VOC/yr; plus, 5 lbs VOC/gal base coat * 20 gals/yr * 1 ton/2,000 lbs = 0.05 tons VOC/yr; plus, 4.6 lbs VOC/gal clear coat * 360 gals/yr * 1 ton/2,000 lbs = 0.82 tons VOC/yr; plus, 6.9 lbs VOC/gal cleaner * 24 gals/yr * 1 ton/2,000 lbs = 0.08 tons VOC/yr; plus, 6.5 lbs VOC/gal cleaner * 6 gals/yr * 1 ton/2,000 lbs = 0.02 tons VOC/yr.

F. Miscellaneous Requirements

- 1. None

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

Facility ID: 0125042494 Emissions Unit ID: K005 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>
automotive coating booth 3 with oven vented to filter	OAC rule 3745-31-05(A)(3) (PTI 01-08530)	Volatile organic compound (VOC) emissions shall not exceed 11.9 pounds per hour, excluding cleanup and 4.4 tons per year, including cleanup.
	OAC rule 3745-21-09(U)(1)	See sections A.2.a and B.1. below. Exempt per OAC rule 3745-21-09(U)(2)(c).

- 2. **Additional Terms and Conditions**
 - (a) The 11.9 lbsVOC/hr limitation was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- 2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
- 3. The permittee shall minimize solvent evaporation by storing waste solvents and coatings in covered containers.
- 4. The maximum annual basecoat usage for this emissions unit shall not exceed 1,120 gallons.
- 5. The maximum annual clearcoat usage for this emissions unit shall not exceed 360 gallons.
- 6. The maximum annual clean-up solvent usage for this emissions unit shall not exceed 24 gallons.
- 7. The maximum annual DX103 solvent usage for this emissions unit shall not exceed 6 gallons.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
 - a. The name and identification of each type of coating and cleanup material employed.
 - b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
 - c. The VOC content of each type of cleanup material, in pounds per gallon.
 - d. The number of gallons of each type of coating and cleanup material employed.
 - e. The number of gallons of each type of cleanup material drummed for shipment off-site.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons. i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).

The annual emission rate shall be determined by dividing the total VOC emissions by 2,000 pounds per ton, i.e. (f) / 2,000.

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F. Miscellaneous Requirements

1. None