

Facility ID: 0125102368 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

Facility ID: 0125102368 Emissions Unit ID: R003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive booth number 3 with gas-fired oven (plastic parts)	OAC rule 3745-31-05(A)(3) (01-06885)	Organic compound (OC) emissions shall not exceed 16.26 lbs OC/hr, excluding cleanup solvent usage and 20.35 tons per year, including cleanup solvent usage. See sections A.2.a, B.1, B.2 and B.3, below.
		Methyl ethyl ketone (MEK) emissions shall not exceed 8.0 lbs MEK/hr. See sections B.1, B.2, and B.3, below.
		Particulate emissions (PE) shall not exceed 0.036 lb PM/hr, and 0.1 ton per year. See section A.2.b, below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and 3745-21-07(G)(2). See section A.2.a, below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See section A.2.b, below
	OAC rule 3745-31-05(D)	MEK emissions shall not exceed 9.8 tons per rolling, 12-month period. See B.1, B.2, and B.3, below.
	OAC rule 3745-17-07(A)	Visible PE from the spray booth filter stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions

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

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5). The permittee shall operate and vent emissions to the dry filtration system, whenever this emissions unit is in operation.

B. Operational Restrictions

1. The permittee shall not employ more than 615 gallons of adhesive in this spray booth during any monthly period.
2. The OC content of adhesives employed in this booth shall not exceed 5.41 lbs OC/gallon and 2.66 lbs MEK/gallon.
3. The permittee shall not employ more than 2 gallons of MEK solvent in booth #3 during any monthly period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for booth 3 (R003) during each day during which adhesives are applied:

- a. the company identification for each coating employed and whether or not the material is a photochemically reactive material;
 - b. the number of gallons of each coating employed in each booth;
 - c. the OC and hazardous air pollutant (HAP) content of each coating, in pounds per gallon;
 - d. the total OC emission rate for all coatings, in pounds per day;
 - e. the total number of hours that each booth was in operation; and
 - f. the average hourly OC emission rate in each booth for all coatings, 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.]
2. The permittee shall collect and record the following information during each month for the purpose of determining annual OC emissions:
- a. the company identification for each cleanup material employed and whether or not the material is a photochemically reactive material;;
 - b. the number of gallons of each cleanup material employed in each booth;
 - c. the OC and HAP content of each cleanup material, in pounds per gallon;
 - d. the total OC and HAP emissions for all cleanup materials, in pounds;
 - e. the total OC and HAP emission rate for all coating, in pounds, by summing the daily emissions from C.1.d. above; and

f The monthly OC and HAP emission rate for all coatings and cleanup materials, in pounds (i.e., the sum of the figures from items (d) and (e)).
3. The permittee shall maintain monthly records of the following information:
- a. summation of the daily adhesive usage figures for each month;
 - b. summation of the rolling, 12 - month MEK and HAP emission rate; and
 - c. any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. The permit to install for this emissions unit R003 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: MEK
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 12.9 lbs/hr
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,179
 MAGLC (ug/m3): 14,047
- 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 Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly exceedance reports to the Central District Office which document any exceedance of the operating restrictions set forth in terms B.1., B.2. and B.3. for the previous three calendar months (January 1 through March 31, April 1 through June 30, July 1 through September 30, and October 1 through December 31).

The reports shall be submitted by April 15, July 15, October 15, and February 15 of each year and shall provide a summary of the record keeping required by terms C.1., C.2., and C.3. for each reported exceedance.
2. The permittee shall submit a quarterly deviation (excursion) report for all periods of time during which the emissions unit was operated while the dry filter system was not in operation, as specified in section A.2.b above, and any actions taken to return the to a compliant operation.

E. Testing Requirements

1. Compliance with the emission limitation shall be determined in accordance with the following methods:
Emissions Limitation
OC emissions shall not exceed 16.26 lbs/hr, excluding cleanup solvent usage

Applicable Compliance Method
Recordkeeping in section C.1.f., above. of adhesive application per day in booth 3 divided by hours of operation.
 $3 \text{ gal/hr} * 5.41 \text{ lbs OC/gal} = 16.2 \text{ lbs OC/hr}$
Emissions Limitation
OC emissions shall not exceed 20.35 ton per year, including cleanup solvent usage.

Applicable Compliance Method
Recordkeeping in section C.2.f., above. of adhesive application per day and per rolling, 12-month period plus recordkeeping of methyl ethyl ketone usage per month.

 $(7,350 \text{ gal/yr} * 5.41 \text{ lbs/gal} * 1 \text{ ton}/2,000 \text{ lbs}) + (24 \text{ gal MEK/yr} * 6.7 \text{ lbs OC/gal} * 1 \text{ ton}/2,000 \text{ lbs}) = 20.3 \text{ tons OC/yr}$
Emissions Limitation
MEK emissions shall not exceed 8.0 lbs/hr, excluding cleanup solvent usage.

Applicable Compliance Method
Recordkeeping in section C.2.f., above.
 $16.2 \text{ lbs OC/hr} * 48\% \text{ MEK/vol} = 8.0 \text{ lbs MEK/hr}$
Emission Limitation
MEK emissions shall not exceed 9.8 tons per rolling, 12-month period, including cleanup solvent usage.

Applicable Compliance Method
Recordkeeping in section C.3.b., for summation of MEK emissions during rolling, 12-month period.

 $(615 \text{ gal/month} * 2.26 \text{ lbs MEK/gal} * 1 \text{ ton}/2,000 \text{ lbs} * 12 \text{ months/yr}) + (24 \text{ gal MEK/yr} * 6.7 \text{ lbs OC/gal} * 1 \text{ ton}/2,000 \text{ lbs}) = 9.8 \text{ tons MEK/yr}$
Emissions Limitation:
Visible PE from the dry filtration system stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. The terms in this permit supercede those identified in PTI 01-6885 issued March 4, 1998.