

Facility ID: 0125252443 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.

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

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Facility ID: 0125252443 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>
K001 - Paint Booth with dry filtration system for the repainting (refinishing) of motor vehicles.	OAC rule 3745-31-05 (A)(3) PTI# 01-8225  OAC rule 3745-21-09(U)(2)(c)	Volatile organic compound emissions shall not exceed 3.8 pounds per hour and 4.6 tons per year, including cleanup. See A.2.a below.  The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply. See B.1. below.

2. **Additional Terms and Conditions**
  - (a) The 3.8 pounds of VOC per hour limitation for this emissions unit was established to reflect the hourly potential to emit and to show compliance with the Ohio EPA Air Toxics Policy. Therefore, it is not necessary to develop 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.

**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 coating employed.
  - b. The VOC content of each coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed.
  - d. The name and identification of each cleanup material employed.
  - e. The VOC content of each cleanup material, in pounds per gallon.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of each cleanup material drummed for shipment off-site.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, that is, the sum of all coatings times the respective VOC content plus the amount of cleanup material employed minus the gallons drummed for shipment times the VOC content of the cleanup material.
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 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. If the annual emission limit of 4.6 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.
- 2. The permittee shall notify the Director (the appropriate District Office or local air agency) 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 the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

**E. Testing Requirements**

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

Emissions Limitation:

Volatile organic compound emissions shall not exceed 3.8 pounds per hour, including cleanup.

Applicable Compliance Method:

Compliance with the hourly VOC limit shall be determined by multiplying the maximum VOC content of the coating/cleanup material used (lbs VOC/gallon of coating or cleanup) times the maximum usage in any hour (gallons/hour).

Emission Limitation:

Volatile organic compound emissions shall not exceed 4.6 tons per year, including cleanup.

Applicable Compliance Method:

Compliance with the annual VOC limit shall be determined by summing the total VOC emissions specified in Section C.1.

- 2. The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10 (B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**F. Miscellaneous Requirements**

- 1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 3.8

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 0.4509

MAGLC (ug/m3): 4476

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. 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.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install;

and,

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 0125252443 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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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>
K002 - Paint booth with dry filtration system for the repainting (refinishing) of motor vehicles. Paint booth #2.	OAC rule 3745-31-05 (A)(3) PTI# 01-8225  OAC rule 3745-21-09(U)(2)(c)	Volatile organic compound emissions shall not exceed 3.8 pounds per hour and 4.6 tons per year, including cleanup. See A.2.a below.  The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply. See B.1. below.

2. **Additional Terms and Conditions**
  - (a) The 3.8 pounds of VOC per hour limitation for this emissions unit was established to reflect the hourly potential to emit and to show compliance with the Ohio EPA Air Toxics Policy. Therefore, it is not necessary to develop 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.

**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 coating employed.
  - b. The VOC content of each coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed.
  - d. The name and identification of each cleanup material employed.
  - e. The VOC content of each cleanup material, in pounds per gallon.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of each cleanup material drummed for shipment off-site.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, that is, the sum of all coatings times the respective VOC content plus the amount of cleanup material employed minus the gallons drummed for shipment times the VOC content of the cleanup material.
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 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. If the annual emission limit of 4.6 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.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) 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 the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

**E. Testing Requirements**

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

Emissions Limitation:

Volatile organic compound emissions shall not exceed 3.8 pounds per hour, including cleanup.

Applicable Compliance Method:

Compliance with the hourly VOC limit shall be determined by multiplying the maximum VOC content of the coating/cleanup material used (lbs VOC/gallon of coating or cleanup) times the maximum usage in any hour (gallons/hour).

Emission Limitation:

Volatile organic compound emissions shall not exceed 4.6 tons per year, including cleanup.

Applicable Compliance Method:

Compliance with the annual VOC limit shall be determined by summing the total VOC emissions specified in Section C.1.

2. The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10 (B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

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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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. 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.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install;  
and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.