

Facility ID: 0165010126 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.

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

Facility ID: 0165010126 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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

Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 Paint booth with flash off area and dry filtration system for the repainting (refinishing) of motor vehicles	OAC rule 3745-31-05(A)(3) PTI 01-7306	See B.1. below. Volatile organic compound (VOC) emissions shall not exceed 8 lbs VOC/gal of coating, 10 pounds per hour, excluding cleanup and 1.79 tons per year, including cleanup. See A.2.a below.
	OAC rule 3745-21-09(U)(2)(c)	Particulate emissions shall not exceed 0.11 pound per hour and 0.002 ton per year
	OAC rule 3745-17-11	The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.
	OAC rule 3745-17-07(A)(1)	The particulate emissions limit specified by this rule is less stringent than the emissions limit established pursuant to OAC rule 3745-31-05(A)(3). Visible particulate emissions from any stack shall not exceed 20% opacity as a six minute average, except as provided by rule.

2. Additional Terms and Conditions

- (a) The 10 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 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 for the 12 months of the calendar year 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 this emissions unit (K001) 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: Xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 1.429
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 331.8
 MAGLC (ug/m3): 10,333

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (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" for the change.
- D. Reporting Requirements**

1. If the annual emission limit of 1.79 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 Central District Office 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 Central District Office 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):
 Emission Limitation:
 VOC emissions shall not exceed 8 lbs VOC/gal of coating

Applicable Compliance Method:

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

Emission Limitation:

VOC emissions shall not exceed 10 pounds per hour, excluding cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum VOC content of the coating (7.6 lbs VOC per gallon) by the maximum usage in one hour (1 gallon per hour).

Emission Limitation:

VOC emissions shall not exceed 1.79 tons per year, including cleanup.

Applicable Compliance Method:

Compliance with the annual VOC emission limit shall be determined by summing the monthly emissions for the calendar year, i.e., the summation of values calculated in C.1.f above.

Emissions Limitation:

Particulate emissions shall not exceed 0.11 pound per hour.

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$

$E = \text{particulate matter emissions rate (pounds per hour)}$

Maximum coating solids usage rate (V7500S coating) = 7.95 #/gal x 44.32% solids

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 40.0%

CE = control efficiency of the control equipment, 99.5%

Emission Limitation:

Particulate emissions shall not exceed 0.002 ton per year

Applicable Compliance Method:

The annual emission limitation was established by the following calculation. Multiply the pound/hour emission rate of 0.011 by the maximum hourly usage rate of 1 gallon/hour given in the application. Multiply this by the monthly gallon usage limit of 37.3 gallons per month (Part II.B.2). Multiply by 12 months and divide by 2000 pounds/ton.

Emission Limitation:

Visible particulate emissions 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.

F. **Miscellaneous Requirements**

1. None