

Facility ID: 0228000101 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: 0228000101 Emissions Unit ID: R002 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>
R002 - JBI downdraft industrial spray booth with exhaust filters	OAC rule 3745-31-05(A)(3) (PTI 02-13626)	Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 57.9 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(c)(iii).
	OAC rule 3745-21-07(G)(9)(c)(iii)	See section A.2.a below.

2. **Additional Terms and Conditions**
 - (a) This emissions units is exempt from the requirements of OAC rule 3745-21-07(G)(2), because no photochemically reactive materials are employed.

B. Operational Restrictions

1. The permittee shall not employ any liquid organic materials which are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. a determination whether or not the coating or cleanup material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the VOC content of each coating and cleanup material, in pounds per gallon; and
 - e. the total VOC emission rate from all coatings and cleanup materials, in pounds per day.

[Note: the coating information must be for the coatings as employed, including any thinner added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which VOC emissions from this emissions unit exceeded 57.9 pounds per day, and the actual VOC emissions for each of such day.
2. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports that include an identification of each time during which photochemically reactive material was employed in this emissions unit, and the total VOC emissions for each such day, in pounds per day. The reports shall also include a statement addressing how the permittee shall avoid such excursions in the future.

E. Testing Requirements

1. Compliance with the emission limitation in section A.1 and the operational restriction in section B.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

VOC emissions from this emissions unit shall not exceed 57.9 pounds per day.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements as specified in section C.1.
Operational Restriction:

The permittee shall not employ any liquid organic materials which are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements as specified in section C.1.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit [R002] was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
 - a. Pollutant: Acetone
TLV (ug/m3): 1,780,000
Maximum Hourly Emission Rate (lbs/hr): 3.5
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 766
MAGLC (ug/m3): 42,380
 - b. Pollutant: MAK
TLV (ug/m3): 233,000
Maximum Hourly Emission Rate (lbs/hr): 0.49
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 107
MAGLC (ug/m3): 5,547
2. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - 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.).
3. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the 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.