

Facility ID: 0228000284 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: 0228000284 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>
small spray booth for miscellaneous metal parts	OAC rule 3745-17-07(A)(1)	The emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-11(B)	The particulate emissions from this emissions unit shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See section B.1 of these terms and conditions.
	OAC rule 3745-31-05(A)(3) (PTI No. 02-15024)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 20.0 pounds per day and 3.65 tons per year, including cleanup materials.
		The particulate emissions from this emissions unit shall not exceed 2.41 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B) and 3745-21-09 (U)(2)(e)(ii).
		There shall be no visible particulate emissions from any stack associated with this emissions unit.
		See section A.2.a of these terms and conditions.

2. **Additional Terms and Conditions**
 - (a) The permittee shall use filters to control the particulate emissions generated from operating this emissions unit.

B. Operational Restrictions

1. The permittee shall not employ more than three (3) gallons of coatings per day in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain the filters while the emissions unit is in operation. The filters shall be installed, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall check the condition of filters on a weekly basis and note the results in an operation log.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents) and cleanup material, as applied.
 - c. The number of gallons of each coating and cleanup material employed, in gallons per day.
 - d. The VOC emissions from each coating and cleanup material, in pounds per day.

- e. The total VOC emissions from all coatings and cleanup materials, in pounds per day.
- f. The total number of gallons of all coatings employed, in gallons per day.
3. The permit to install for this emissions unit (K002) 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):
- a. Pollutant: Methyl Isobutyl Ketone
- TLV (mg/m3): 204.826
- Maximum Hourly Emission Rate (lbs/hr): 0.72
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 54.42
- MAGLC (ug/m3): 4,877
- b. Pollutant: Xylene
- TLV (mg/m3): 434.193
- Maximum Hourly Emission Rate (lbs/hr): 0.92
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 69.52
- MAGLC (ug/m3): 10,338
4. 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.).
5. 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.
6. 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 deviation (excursion) reports that identify each day during which the daily VOC emissions from this emissions unit exceeded 20.0 pounds per day, and the actual VOC emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with section 3 of General Terms and Conditions.

2. The permittee shall also submit deviation (excursion) reports that identify each day during which the total coatings used in this emissions unit exceeded three gallons per day, and the actual coating usage for each such day.

Per OAC rule 3745-21-09 (B)(3)(e), a copy of each record shall be sent to the director within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emission Limitation:
20.0 pounds per day of VOC

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in Section C.2 of these terms and conditions.

b. Emission Limitation:
0.551 pound per hour of particulate emissions

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operation:

$$E = CS \times (1 - TE) \times (1 - CE)$$

Where,

E = particulate emissions rate, in pounds per hour
CS = maximum coating solids usage rate, in pounds per hour
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 (80%, per AP - 42 Section 4.2.2.4)
CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03 (B)(10).

c. Emission Limitation:
3.65 tons per year of VOC
2.41 tons per year of PE

Applicable Compliance Method:
The tons per year limitations were developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8,760 hours per year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

d. Emission Limitation:
0% opacity as a 6-minute average from stack

Applicable Compliance Method:
Compliance shall be determined in accordance with the test method and procedures in USEPA Method 9 of 40 CFR Part 60, Appendix A.

2. Compliance with the operational restrictions in Section B of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:
3.0 gallons per day of coating usage

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in Section C.2 of these terms and conditions.

3. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. None