

Facility ID: 0238000008 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: 0238000008 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 -wood garage door section priming operation consisting of two Caroline-Virginia 15x8 spray booths with automatic airless spray guns and a 40,000 cfm air drying chamber with a product conveyor system	OAC rule 3745-31-05(A)(3) (PTI 02-15937) (Effective December 18, 2001)	See sections A.2.a, A.2.b and A.2.c below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See section A.2.c below.

2. **Additional Terms and Conditions**
 - (a) The organic compound (OC) emissions from coatings shall not exceed 4.1 pounds per hour. The OC emissions from all coatings shall not exceed 1.35 tons per year. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

1. The permittee shall use only water for thinning and cleanup.
2. The permittee shall operate the dry filters whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, in lbs/gallon;
 - d. the total OC emission rate for all coatings, in lbs/day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings, i.e., (d)/(e), in lbs/hr.
3. The permittee shall maintain records of the annual OC emissions calculated as the sum of the daily OC emissions from section C.2.d for the calendar year.
4. 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: glycol ethers

TLV (mg/m3): 15.6

Maximum Hourly Emission Rate (lbs/hr): 2.04

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 214

b. Pollutant: 2-butoxyethanol

TLV (mg/m3): 96.7

Maximum Hourly Emission Rate (lbs/hr): 1.39

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 152

MAGLC (ug/m3): 2,302

5. 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.).

6. 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.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that:

a. Dry filters were not in service when the emissions unit was in operation.

b. Photochemically reactive material was employed in this emissions unit. The written notification shall include the gallons of photochemically reactive material employed and a description of the corrective measures taken to prevent a reoccurrence.

c. Clean up material or thinner other than water was employed in this emissions unit. The written notification shall include the gallons of cleanup material or thinner employed, the chemical composition of material and a description of the corrective measures taken to prevent a reoccurrence.

The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average OC emissions from the coatings exceed 4.1 lbs/hr, and the actual average OC emissions for each such day.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall submit annual compliance reports that include:

a. a list of all allowable emission limitations and operational restrictions in sections A.1, A.2 and B.1;

- b. a statement whether the emissions unit is in compliance with the requirements listed; and
- c. the total OC emissions from this emissions unit for the previous calendar year.

The report shall be submitted to the Director (Ohio EPA, Northeast District Office) by February 1 of each year and shall cover the previous calendar year.

- 4. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

E. Testing Requirements

- 1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

4.1 pounds OC emissions per hour from all coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2.f.

Emission Limitation:

1.35 tons of OC emissions per year from all coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.3.

- 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

- 1. None