

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: R003 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 finish system to coat metal and fiberglass garage door sections. Parts are manually moved, and coated with a HVLP gun. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-21655 Effective 1/17/2006) | See also A.2.a, A.2.b and A.2.c below.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3724-21-07(G)(1)   |
|  | OAC rule 3745-21-09(U)(1)                                       | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).         |
| Associated heat cured IR oven  | OAC rule 3745-21-07(G)(1)                                       | The hourly emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). |
|  | OAC rule 3745-17-11(C)  | See A.2.d below.   |

**2. Additional Terms and Conditions**

- (a) The VOC content of the coatings employed shall not exceed 1.8 lbs per gallon, as applied, excluding water and exempt solvents.  
The organic compound (OC) emissions from the IR oven when heat curing non-metal pieces shall not exceed 15 pounds per day.  
Volatile organic compound (VOC) emissions and organic compound (OC) emissions shall not exceed 0.97 pounds per hour, and 4.3 tons per year from coatings and cleanup materials. The allowable VOC and OC emissions are based upon a 1.8 gallons per hour usage rate and a 0.54 pounds OC/VOC per gallon, as applied, coating formulation.  
The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

**B. Operational Restrictions**

1. The permittee shall operate and maintain the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
2. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
2. The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

3. In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
4. The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
5. The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
6. The permittee shall collect and record the following information each day for the coating line:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied;
  - c. the OC/VOC content of each coating and cleanup material, as applied including water and exempt solvents;
  - d. the number of gallons of each coating and cleanup material, as applied;
  - e. the daily OC/VOC emissions from all the coatings and cleanup material employed, in pounds, [i.e., the sum of (c) times (d) for each coating and cleanup material employed];
  - f. the total number of hours this emissions unit was in operation; and
  - g. the average hourly OC/VOC emissions from all coatings and cleanup materials employed, in pounds [i.e., the quotient of (e) divided by (f)].
7. The permittee shall calculate and record the total annual OC/VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC/VOC emission rates from the coating materials for the calendar year in Section C.2].
8. The permit to install for this emissions unit R003 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):
 

Pollutant: 2-butoxyethanol  
 TLV (mg/m3): 97.7  
 Maximum Hourly Emission Rate (lbs/hr): 0.97  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):207  
 MAGLC (ug/m3): 2,326
9. 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.).
10. 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.

11. 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 submit quarterly deviation reports that identify:
  - a. each day the OC/VOC emissions exceeded the daily emission limit specified above.
  - b. any exceedance of the allowable OC/VOC content of the coating, as applied, less water and exempt solvent; and
  - c. any daily record showing that the dry particulate filter was not in service when the emissions unit was in operation.

The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit an annual report of the total VOC emissions from this emissions unit for the calendar year. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:  
Emissions Limitation:  
1.8 lbs OC/VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.6.b.  
Emissions Limitation:  
0.97 lbs/hr of VOC emissions

Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.6.g.  
Emissions Limitation:  
4.3 TPY of VOC emissions

Applicable Compliance Method:  
Compliance shall be based upon the record keeping specified in Section C.7.  
Emissions Limitation:  
15 pounds per day of OC emissions from the IR oven when heat curing non-metal pieces

Applicable Compliance Method:  
Compliance shall be assumed for all days the total OC emissions from the coating does not exceed 23.3 pounds based upon the following formula:

$$(0.97 \text{ lbs/hr}) \times (24 \text{ hours/day}) \times (15\%)$$

where:  
0.97 lbs/hr is the maximum VOC/OC usage rate of the coating operation; and

15% is the maximum percentage of the organic compounds employed in the spray coating operation emitted uncontrolled in this IR oven. If required this "split" of organic compound emissions between this IR oven and the associated spray booth shall be verified by testing according to Method 204 or other test method approved by the Director.

**F. Miscellaneous Requirements**

1. None