

Facility ID: 0238000159 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: 0238000159 Emissions Unit ID: R010 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>
Protect aire 12x13x10 spray booth for the application of stains to metal and fiberglass doors, with flash-off oven.	OAC Rule 3745-31-05(A)(3) (SM PTI 02-2-14513 mod1 Effective 12/31/2002)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e below.
	OAC Rule 3745-21-07(G)	See A.2.d below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-31-05(D)	See A.2.b below.
	OAC rule 3745-17-11(C)	See A.2.f below.

**2. Additional Terms and Conditions**

- (a) The VOC emissions from coatings shall not exceed 266.3 pounds per day.  
 The VOC emissions from all coatings shall not exceed 3.5 tons per rolling, 12-month period.  
 The permittee shall employ only water and exempt solvents as cleanup material.  
 The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.  
  
 The requirements established under OAC rule 3745-21-07 shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current rule as a revision to the Ohio SIP for the control of organic compounds.  
 The VOC content of metal and non-metal coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.  
 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.  
  
 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.
2. The annual coating usage in this emissions unit shall not exceed 2000 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents.

**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.  
 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.

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.

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.

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.

2. The permittee shall maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - b. the VOC content (excluding water and exempt solvents) of each coating, as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
  - d. the daily VOC emission from all coatings combined, in pounds, (the sum of b times c for each coating); and
  - e. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Note: If the VOC content of all the coatings is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvent, the daily volume-weight average VOC content record is not required.

4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:
  - a. the total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC emissions recorded according to C.3.d); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period, in tons.
5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
  - a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.c); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. The permit to install for this emissions unit R010 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: Acetone
 

TLV (mg/m3): 1,188

Maximum Hourly Emission Rate (lbs/hr): 1.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 93

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951

MAGLC (ug/m3): 28,289
  - b. Pollutant: Xylene
 

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.11

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5.6

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417

MAGLC (ug/m3): 10,339

c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 15

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112

MAGLC (ug/m3): 23,410

d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 0.47

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 24

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807

MAGLC (ug/m3): 16,973

e. Pollutant: Methyl n-ketone

TLV (mg/m3): 234

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39

Predicted 1-Hour M

8. 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 still 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:
- 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;
  - 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
  - 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.).
9. 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.
10. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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**

- The permittee shall notify the Director in writing of any daily record showing that:
  - the dry filters were not in service when the emissions unit was in operation; or

- b. cleanup material other than water or exempt solvents were employed.

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 reports which include the following information from this emission unit:

- a. an identification of each day VOC emissions exceeded the limit specified above;
- b. all exceedences of the rolling, 12-month VOC limit; and
- c. all exceedences of the rolling, 12-month coating limit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year. If no deviations of the VOC content limit occurred, include a "no deviations" statement on the annual report.

3. The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing the use of a daily volume-weighted average greater than 3.5 pounds VOC/gal, as applied, excluding water and exempt solvent. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days following the exceedance.

4. The permittee shall also submit annual reports which summarize the following information:

- a. the total emissions of VOC from this emission unit;
- b. the total coating usage of this emissions unit, excluding water and exempt solvent, and
- c. all exceedences of the daily, volume-weighted average VOC content.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

**E. Testing Requirements**

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

Emission Limitation:

3.5 lbs/gal daily volume-weighted average VOC content of all coatings, as applied.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Emission Limitation:

266.3 lbs of VOC per day

Applicable Compliance Method:

Compliance shall be determined by the records required in Section C.3.d.

Emissions Limitation:

3.5 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.b.

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

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F; except C.7, C.8, C.9 and C.10.