

Facility ID: 0238000175 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: 0238000175 Emissions Unit ID: R001 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>
R001 - Spraybake booth 1, refinishing metal and non-metal automobiles, controlled with dry filters.	OAC rule 3745-31-05(A)(3) (PTI 02-14902)	See section A.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See section A.2.b below.
	OAC rule 3745-21-09(U)(2)(c)	See section A.2.c below.

2. **Additional Terms and Conditions**
 - (a) Organic compound (OC) emissions shall not exceed 7.3 tons per year.
OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
The requirements of OAC rule 3745-21-09(U)(1) shall not apply to this emissions unit as long as the coating booth is only employed to repaint (refinish) used motor vehicles and trailers.

B. Operational Restrictions

1. 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 any 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 and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day, (i.e. the sum of b times c for each coating and cleanup material);
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, (i.e., d divided by e, in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:
 - a. the company identification for each nonphotochemically reactive cleanup material employed;
 - b. the number of gallons of each nonphotochemically reactive cleanup material employed;

- c. the OC content of each nonphotochemically reactive cleanup material, in pounds per gallon; and
- d. the total OC emission rate for all nonphotochemically reactive cleanup materials, in pounds, (i.e. the sum of b times c for each cleanup material).
4. The permit to install for this emissions unit [R001] 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: amyl acetate
 TLV (mg/m3): 531
 Maximum Hourly Emission Rate (lbs/hr): 2.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 51
 MAGLC (ug/m3): 12,642
- Pollutant: n-butyl acetate
 TLV (mg/m3): 721
 Maximum Hourly Emission Rate (lbs/hr): 3.69
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94
 MAGLC (ug/m3): 17,167
- Pollutant: ethyl acetate
 TLV (mg/m3): 1,441
 Maximum Hourly Emission Rate (lbs/hr): 3.32
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 85
 MAGLC (ug/m3): 34,310
- Pollutant: isopropyl alcohol
 TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 6.35
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 162
 MAGLC (ug/m3): 23,381
- Pollutant: methyl ethyl ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.30
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33
 MAGLC (ug/m3): 14,04
- Pollutant: methyl isobutyl ketone
 TLV (mg/m3): 205
 Maximum Hourly Emission Rate (lbs/hr): 1.43
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 36
 MAGLC (ug/m3): 4,881
- Pollutant: toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 3.82
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 97
 MAGLC (ug/m3): 4,476
- Pollutant: VM&P naptha
 TLV (mg/m3): 1399
 Maximum Hourly Emission Rate (lbs/hr): 1.82
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46
 MAGLC (ug/m3): 33,310
- Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 4.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 102
 MAGLC (ug/m3): 10,333
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 the dry filters were not in service when the emissions unit was in operation. 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 the following information:
 - a. an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

8 pounds per hour of OC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2.f. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
Emission Limitation:

40 pounds per day of OC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2.d. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
Emission Limitation:

7.3 tons per year of OC emissions

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily OC emissions recorded in section C.2.d for the calendar year and the monthly OC emissions recorded in section C.3.d for the calendar year, and then dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

1. None