

Facility ID: 0238000230 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: 0238000230 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>
flow coating of primer on wood and fiber cement siding	OAC rule 3745-31-05(A)(3) (PTI 02-22938 effective 3/13/08) OAC rule 3745-17-11(A)(1)(i)	See sections A.2.a, A.2.b and A.2.c below.  This emissions unit is exempt from the requirements of OAC rule 3745-17-11(C) because it employs flow coat technology.

2. **Additional Terms and Conditions**
  - (a) The volatile organic compound (VOC) emissions from all the coatings shall not exceed 5.31 pounds per hour. [This limit is based upon the maximum application rate of 9.0 gallon per hour.]  
The VOC content of each coating shall not exceed 0.59 pounds per gallon, as applied.  
The VOC emissions from all coatings and cleanup materials from this emissions unit shall not exceed 23.26 tons per year.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information for each day:
  - a. the company identification for each coating or cleanup material employed;
  - b. the volatile organic compound (VOC) content of each coating, in lbs/gallon, as applied;
  - c. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
  - d. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (b);
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly VOC emission rate for all the coatings, i.e., (d)/(e), in lbs/hr.
2. The permittee shall collect and record the following information for each month for the emissions unit:
  - a. the number of gallons of each VOC containing cleanup material employed minus the number of gallons of VOC containing cleanup material recovered for disposal;
  - b. the volatile organic compound (VOC) content of each cleanup material, in lbs/gallon; and
  - c. the total VOC emissions from all VOC containing cleanup materials employed, in lbs/month, i.e., sum of (b) times (a).
3. The permittee shall calculate and record the total VOC emissions from all the coatings and cleanup materials employed, in tons per calendar year; [i.e., (the summation of the daily VOC emissions, from section C.1.d, for the calendar year + the monthly cleanup material VOC emission from section C.2.c) divided by 2000 lbs/ton].

**D. Reporting Requirements**

1. The permittee shall submit annual reports that:
  - a. identify any daily record that shows the coating exceeded the VOC content limitation, and the actual VOC content, in pounds per gallon, of any such coating;
  - b. identify any daily record that shows the VOC emissions exceeded the hourly limitation and the actual hourly VOC emissions on such days; and
  - c. states the actual VOC emissions for the calendar year.

These reports shall be submitted to the Director (Ohio EPA Northeast District Office) 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:

Emissions Limitation:  
5.31 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in Section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emissions Limitation:  
23.26 tons per year of VOC emissions from all coatings and cleanup materials from this emissions unit

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Sections C.1, C.2, and C.3 of this permit.

Emissions Limitation:  
0.59 pounds of VOC per gallon coating, as applied.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by a certified environmental data sheet supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.