

Facility ID: 0243081231 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.

- [Go to Part II for Emissions Unit P001](#)
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Facility ID: 0243081231 Emissions Unit ID: P001 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>
Traffic Paint Dispenser System #1, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07.
	OAC rule 3745-31-05 PTI No. 02-4672	See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits: a. 0.1 pound per hour and 0.44 ton per year of particulates; and b. 0.01 pound per hour and 0.044 ton per year of lead.
	OAC rule 3745-35-07	The VOC limits specified in the PTI are less stringent than the OC limits established pursuant to OAC rule 3745-35-07. See section A.2.a - A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly

emissions.

The emissions of each single hazardous air pollutant (HAP), excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009 and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.

The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.

The organic compound emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. These limits apply to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. To ensure compliance with the OC emission limits in section A.2.d of these terms and conditions, the permittee shall keep the following weekly records:
 - a. Name or ID of each solvent, including cleanup solvents, used in this emissions unit.
 - b. Amount of each solvent used, "DS", in pounds per week.
 - c. The total amount of solvent usage, "TDS", in pounds per week. "TDS" is equal to the summation, from $i = 1$ to $i = n$, of (DS)_i, where:
i = subscript denoting a solvent, and
n = the number of different solvents.
 - d. The total operating days, "OTD", in days per week.
 - e. The total operating hours, "OT" , in hours per week.
 - f. The amount of OC emitted from the disperser, in pounds per week, to be defined as "DDV". "DDV" shall be calculated as follows:
 $DDV = TDS * EF$,
where, EF = emission factor, pounds OC per pound of solvents used, which shall be based upon the most recent stack test. The current EF is 0.000021 pound OC per pound of solvents used, which was determined by the most recent stack test, conducted on February 16, 1996.
 - g. The amount of OC emitted from the letdown tanks, in pounds per week, to be defined as "DTV". "DTV" shall be calculated based upon AP - 42, 1995, Chapter 7, Liquid Storage Tanks, equation 1 - 23, working loss from fixed roof tanks, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.
 - h. The amount of OC emitted from the filling stations, in pounds per week, to be defined as "DLV". "DLV" shall be calculated based upon AP - 42, 1995, Chapter 5.2, Transportation and Marketing of Petroleum Liquids, equation 1, emissions from loading petroleum liquids, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.
 - i. The weekly OC emissions from this emissions unit, in pounds per week, to be defined as "WV". "WV" shall be calculated as follows:
 $WV = DDV + DTV + DLV$
 - j. The average daily OC emissions from this emissions unit, in pounds per day, to be defined as "DV". "DV" shall be calculated as follows:
 $DV = WV / OTD$
 - k. The average hourly OC emissions rate, in pounds per hour, to be defined as "HV". "HV" shall be calculated as follows:
 $HV = WV / OT$
2. To ensure compliance with the HAP limits, the permittee shall keep the following weekly records:
 - a. Name or ID for each HAP employed in this emissions unit.
 - b. The amount of each single HAP employed, "MH", in pounds per week.
 - c. The amount of each single HAP emitted from this emissions unit, in pounds per week, to be defined as "SHAP". "SHAP" shall be calculated as follows:
 $SHAP = (MH / TDS) * WV$
where, "WV" and "TDS" are as defined in section C.1 of these terms and conditions.
 - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals the summation, from $i = 1$ to $i = n$, of (SHAP)_i, where
i = subscript denoting a single HAP, and
n = the number of different single HAPs.
3. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
 - a. the emissions of each single HAP; and
 - b. the emissions of combined HAPs.
4. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and

maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such week.
 - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
 - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
 - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
 - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC Rule 3745-17-03 (B)(1).
 - b. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
 - c. Emissions Limitation:
0.01 lb/hour of lead

Applicable Compliance Method: Compliance shall be determined in accordance with test Method 12 of 40 CFR Part 60, Appendix A, if required by Ohio EPA.
 - d. Emission Limitation:
0.44 ton/year of particulates
0.044 ton/year of lead

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.
 - b. Emission Limitation:
9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.
 - c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

d. Emissions Limitation:
8 lbs/hour of OC
40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section C.1 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.
4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to determine the emission factor, in pound OC per pound of solvent used, for the disperser.
 - c. The following test method shall be employed: Method 25A, 40 CFR Part 60, Appendix A . Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:
A - F.

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Facility ID: 0243081231 Emissions Unit ID: P002 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>
Traffic Paint Disperser System #2, consisting of a disperser, letdown tanks, and filling	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate

stations.

OAC rule 3745-17-11

OAC rule 3745-21-07 (G)(2)

OAC rule 3745-31-05
PTI 02-4672

OAC rule 3745-35-07

emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.

The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

The OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07.

See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits:

- a. 0.1 pound per hour and 0.44 ton per year of particulates; and
- b. 0.01 pound per hour and 0.044 ton per year of lead.

The VOC limits specified in the PTI are less stringent than the OC limits established pursuant to OAC rule 3745-35-07.

See section A.2.a - A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions. The emissions of each single hazardous air pollutant (HAP), excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009 and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions. The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions. The organic compound emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. These limits apply to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. To ensure compliance with the OC emission limits specified in section A.2.d of these terms and conditions, the permittee shall keep the following weekly records:
 - a. Name or ID of each solvent, including cleanup solvents, used in this emissions unit.
 - b. Amount of each solvent used, "DS", in pounds per week.
 - c. The total amount of solvent usage, "TDS", in pounds per week. "TDS" equals to the summation, from $i = 1$ to $i = n$, of $(DS)_i$, where:
 i = subscript denoting a solvent, and
 n = the number of different solvents.
 - d. The total operating days, "OTD", in days per week.
 - e. The total operating hours, "OT", in hours per week.
 - f. The amount of OC emitted from the disperser, in pounds per week, to be defined as "DDV". "DDV" shall be calculated as follows:
 $DDV = TDS * EF$,
where, EF = emission factor, pounds OC per pound of solvents used, which shall be based upon the most recent stack test. The current EF is 0.000021 pound OC per pound of solvents used, which was determined by the most recent stack test, conducted on February 16, 1996.
 - g. The amount of OC emitted from the letdown tanks, in pounds per week, to be defined as "DTV". "DTV" shall be calculated based upon AP - 42, 1995, Chapter 7, Liquid Storage Tanks, equation 1 - 23, working loss from fixed roof tanks, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.
 - h. The amount of OC emitted from the filling stations, in pounds per week, to be defined as "DLV". "DLV" shall be calculated based upon AP - 42, 1995, Chapter 5.2, Transportation and Marketing of Petroleum Liquids, equation 1, emissions from loading petroleum liquids, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.
 - i. The weekly OC emissions from this emissions unit, in pounds per week, to be defined as "WV". "WV" shall be calculated as follows:

$$WV = DDV + DTV + DLV$$

j. The average daily OC emissions from this emissions unit, in pounds per day, to be defined as "DV". "DV" shall be calculated as follows:

$$DV = WV / OTD$$

k. The average hourly OC emissions rate, in pounds per hour, to be defined as "HV". "HV" shall be calculated as follows:

$$HV = WV / OT$$

2. To ensure compliance with the HAP limits, the permittee shall keep the following weekly records:
 - a. Name or ID for each HAP employed in this emissions unit.
 - b. The amount of each single HAP employed, "MH", in pounds per week.
 - c. The amount of each single HAP emitted from this emissions unit, in pounds per week, to be defined as "SHAP". "SHAP" shall be calculated as follows:

$$SHAP = (MH / TDS) * WV$$
 where, "WV" and "TDS" are as defined in section C.1 of these terms and conditions
 - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals the summation, from $i = 1$ to $i = n$, of $(SHAP)_i$, where
 i = subscript denoting a single HAP, and
 n = the number of different single HAPs.
3. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
 - a. the emissions of each single HAP; and
 - b. the emissions of combined HAPs.
4. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such week.
 - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
 - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
 - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
 - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC Rule 3745-17-03 (B)(1).
 - b. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

c. Emissions Limitation:
0.01 lb/hour of lead

Applicable Compliance Method: Compliance shall be determined in accordance with test Method 12 of 40 CFR Part 60, Appendix A, if required by Ohio EPA.

d. Emission Limitation:
0.44 ton/year of particulates
0.044 ton/year of lead

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

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

a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

b. Emission Limitation:
9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

d. Emissions Limitation:
8 lbs/hour of OC
40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.1 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to determine the emission factor, in pound OC per pound of solvent used, for the disperser.

c. The following test method shall be employed: Method 25A, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:
A - F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0243081231 Emissions Unit ID: P004 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>
Industrial Paint Dispenser System #4, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits: a. 7.2 pounds per hour and 7.2 tons per year of VOC; and b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit :
 - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels.
 - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:
 $SP = PR * S\%$
 where,
 PR = the annual production rate, in tons per year.
 S% = the average percentage of solvent in products, by weight.
 - c. The waste solvent, in tons per year, to be defined as "WS".
 - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:
 $YOC = SU - SP - WS$
 - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:
 $EF = YOC / SU$
 2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
 - a. Name or ID of each solvent used in this emissions unit.
 - b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
 - c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from $i = 1$ to $i = n$, of (WS)_i, where:
 $i =$ subscript denoting a solvent; and
 $n =$ the number of different solvents.
 - d. The total operating days, "OD", in days per week.
 - e. The total operating hours, "OT", in hours per week.
 - f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:
 $WOC = TWS * EF$
 where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
 - g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:
 $DOC = WOC / OD$
 - h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:
 $HOC = WOC / OT$
 - i. The rolling 52-week summations of OC emissions.
 3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
 - a. Name or ID for each HAP employed in this emissions unit.
 - b. The amount of each single HAP employed, "MH", in pounds per week.
 - c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:
 $SHAPM = (MH / TWS) * WOC$
 where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
 - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from $i = 1$ to $i = n$, of (SHAP)_i, where
 $i =$ subscript denoting a single HAP, and
 $n =$ the number of different single HAPs.
 4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
 - a. the emissions of each single HAP; and
 - b. the emissions of combined HAPs.
 5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 7.2 pounds per hour, and the actual average hourly OC emissions for each such week.
 - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40

pounds per day, and the actual average daily OC emissions from each such week.

- c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
 - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
 - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
 3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
 4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
 5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).
 - b. Emissions Limitation:
7.2 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
 - c. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
 - d. Emissions Limitation:
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
 - e. Emission Limitation:
7.2 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - b. Emission Limitation:
9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation:
40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and OC contents of each material used in this emissions unit.

F. Miscellaneous Requirements

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.

2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:
A - F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0243081231 Emissions Unit ID: P005 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>
Industrial Paint Dispenser System #5, consisting of a dispenser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits: a. 7.2 pounds per hour and 7.2 tons per year of VOC; and

OAC rule 3745-35-07

b. 0.1 pound per hour and 0.44 ton per year of particulates.

See section A.2.a and A.2.d of these terms and conditions.

2. **Additional Terms and Conditions**

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
 The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
 The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
 The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

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

1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
- The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
 - The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:

$$SP = PR * S\%$$
 where,
 PR = the annual production rate, in tons per year.
 S% = the average percentage of solvent in products, by weight.
 - The waste solvent, in tons per year, to be defined as "WS".
 - The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:

$$YOC = SU - SP - WS$$
 - The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:

$$EF = YOC / SU$$
2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
- Name or ID of each solvent used in this emissions unit.
 - Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
 - The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from $i = 1$ to $i = n$, of (WS)_i, where:
 $i =$ subscript denoting a solvent, and
 $n =$ the number of different solvents.
 - The total operating days, "OD", in days per week.
 - The total operating hours, "OT", in hours per week.
 - The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:

$$WOC = TWS * EF$$
 where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
 - The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:

$$DOC = WOC / OD$$
 - The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:

$$HOC = WOC / OT$$
 - The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
- Name or ID for each HAP employed in this emissions unit.
 - The amount of each single HAP employed, "MH", in pounds per week.
 - The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:

$$SHAPM = (MH / TWS) * WOC$$

where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.

d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from $i = 1$ to $i = n$, of (SHAP),
 where
 i = subscript denoting a single HAP, and
 n = the number of different single HAPs.

4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
 - a. the emissions of each single HAP; and
 - b. the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 7.2 pounds per hour, and the actual average hourly OC emissions for each such week.
 - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
 - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
 - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
 - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).
 - b. Emissions Limitation:
7.2 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
 - c. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
 - d. Emissions Limitation:
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

- e. Emission Limitation:
7.2 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
- 2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - b. Emission Limitation:
9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - d. Emissions Limitation:
40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

F. Miscellaneous Requirements

- 1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
- 2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:
A - F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0243081231 Emissions Unit ID: P006 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>
Industrial Paint Dispenser System #6,	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not

consisting of a disperser, letdown tanks, and filling stations.

OAC rule 3745-17-11

OAC rule 3745-21-07 (G)(2)

OAC rule 3745-31-05
PTI No. 02-4672

OAC rule 3745-35-07

cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.

The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions.

The permittee shall not exceed the following limits:

a. 6.0 pounds per hour and 6.24 tons per year of VOC; and

b. 0.1 pound per hour and 0.44 ton per year of particulates.

See section A.2.a and A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
 - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
 - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:
 $SP = PR * S\%$
 where,
 PR = the annual production rate, in tons per year.
 S% = the average percentage of solvent in products, by weight.
 - c. The waste solvent, in tons per year, to be defined as "WS".
 - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:
 $YOC = SU - SP - WS$
 - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:
 $EF = YOC / SU$
- 2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
 - a. Name or ID of each solvent used in this emissions unit.
 - b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
 - c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from $i = 1$ to $i = n$, of $(WS)_i$, where:
 i = subscript denoting a solvent, and
 n = the number of different solvents.

- d. The total operating days, "OD", in days per week.
- e. The total operating hours, "OT", in hours per week.
- f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:
 $WOC = TWS * EF$
 where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
- g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:
 $DOC = WOC / OD$
- h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:
 $HOC = WOC / OT$
- i. The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
- a. Name or ID for each HAP employed in this emissions unit.
- b. The amount of each single HAP employed, "MH", in pounds per week.
- c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:
 $SHAPM = (MH / TWS) * WOC$
 where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
- d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from $i = 1$ to $i = n$, of (SHAP)_i, where
 i = subscript denoting a single HAP, and
 n = the number of different single HAPs.
4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
- a. the emissions of each single HAP; and
- b. the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
- a. An identification of each week during which the average OC emissions from this emissions unit exceeded 6.0 pounds per hour, and the actual average hourly OC emissions for each such week.
- b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
- c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
- d. An identification of each week during which the rolling 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
- e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

b. Emissions Limitation:
6.0 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

c. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

d. Emissions Limitation:
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

e. Emission Limitation:
6.24 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

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

a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

b. Emission Limitation:
9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation:
40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

F. Miscellaneous Requirements

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.

2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:
A - F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0243081231 Emissions Unit ID: P007 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>
Industrial Paint Dispenser System #4, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05. The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions.
	OAC rule 3745-31-05 PTI No. 02-4672	The permittee shall not exceed the following limits: a. 2.4 pounds per hour and 2.4 tons per year of VOC; and b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
 - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
 - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:
SP = PR * S%

where,

PR = the annual production rate, in tons per year.
S% = the average percentage of solvent in products, by weight.

c. The waste solvent, in tons per year, to be defined as "WS".

d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:
 $YOC = SU - SP - WS$

e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:
 $EF = YOC / SU$

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:

a. Name or ID of each solvent used in this emissions unit.

b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.

c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from $i = 1$ to $i = n$, of (WS)_i, where:
 $i =$ subscript denoting a solvent, and
 $n =$ the number of different solvents.

d. The total operating days, "OD", in days per week.

e. The total operating hours, "OT", in hours per week.

f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:
 $WOC = TWS * EF$

where, EF = emission factor, pound OC per pound of solvents used. See section F.1 of these terms and conditions.

g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:
 $DOC = WOC / OD$

h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:
 $HOC = WOC / OT$

i. The rolling 52-week summations of OC emissions.

3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:

a. Name or ID for each HAP employed in this emissions unit.

b. The amount of each single HAP employed, "MH", in pounds per week.

c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:
 $SHAPM = (MH / TWS) * WOC$
where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.

d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from $i = 1$ to $i = n$, of (SHAP)_i, where
 $i =$ subscript denoting a single HAP, and
 $n =$ the number of different single HAPs.

4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:

a. the emissions of each single HAP; and

b. the emissions of combined HAPs.

5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. An identification of each week during which the average OC emissions from this emissions unit exceeded 2.4 pounds per hour, and the actual average hourly OC emissions for each such week.

b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.

c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.

d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03

tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.

- e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).
 - b. Emissions Limitation:
2.4 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
 - c. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
 - d. Emissions Limitation:
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
 - e. Emission Limitation:
2.4 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - b. Emission Limitation:
9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - d. Emissions Limitation:
40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

F. Miscellaneous Requirements

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:
A - F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0243081231 Emissions Unit ID: P008 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>
Industrial Paint Dispenser System #8 consist of a dispenser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits: a. 3.4 pounds per hour and 3.36 tons per year of VOC; and b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and

P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.

The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.

The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.

The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
 - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
 - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:

$$SP = PR * S\%$$
 where,
 PR = the annual production rate, in tons per year.
 S% = the average percentage of solvent in products, by weight.
 - c. The waste solvent, in tons per year, to be defined as "WS".
 - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:

$$YOC = SU - SP - WS$$
 - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:

$$EF = YOC / SU$$
2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
 - a. Name or ID of each solvent used in this emissions unit.
 - b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
 - c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from $i = 1$ to $i = n$, of $(WS)_i$, where:
 i = subscript denoting a solvent, and
 n = the number of different solvents.
 - d. The total operating days, "OD", in days per week.
 - e. The total operating hours, "OT", in hours per week.
 - f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:

$$WOC = TWS * EF$$
 where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
 - g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:

$$DOC = WOC / OD$$
 - h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:

$$HOC = WOC / OT$$
 - i. The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
 - a. Name or ID for each HAP employed in this emissions unit.
 - b. The amount of each single HAP employed, "MH", in pounds per week.
 - c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:

$$SHAPM = (MH / TWS) * WOC$$
 where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
 - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from $i = 1$ to $i = n$, of $(SHAP)_i$, where
 i = subscript denoting a single HAP, and
 n = the number of different single HAPs.
4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:

- a. the emissions of each single HAP; and
 - b. the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
- D. Reporting Requirements**
- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 3.4 pounds per hour, and the actual average hourly OC emissions for each such week.
 - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
 - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
 - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
 - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
 - 2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
 - 3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
 - 4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
 - 5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
- E. Testing Requirements**
- 1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average
 - Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).
 - b. Emissions Limitation:
3.4 lbs/hour of VOC
 - Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
 - c. Emission Limitation:
0.1 lb/hour of particulates
 - Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
 - d. Emissions Limitation:
0.44 ton/year of particulates
 - Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
 - e. Emission Limitation:
3.36 tons/year of VOC
 - Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
 - 2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

b. Emission Limitation:

9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

c. Emission Limitation:

19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation:

40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

F. Miscellaneous Requirements

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.

2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0243081231 Emissions Unit ID: P009 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>
Industrial Paint Dispenser System #9, consisting of a dispenser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.

OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05. The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions.
OAC rule 3745-31-05 PTI No. 02-8023	The permittee shall not exceed the following limits: a. 1.52 pounds per hour and 1.44 tons per year of VOC; and b. 0.1 pound per hour and 0.44 ton per year of particulates.
OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- (a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
The organic compound emissions from this emissions unit shall not exceed 36.48 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine emission factor for this emissions unit:
 - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
 - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:
 $SP = PR * S\%$
 where,
 PR = the annual production rate, in tons per year.
 S% = the average percentage of solvent in products, by weight.
 - c. The waste solvent, in tons per year, to be defined as "WS".
 - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:
 $YOC = SU - SP - WS$
 - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:
 $EF = YOC / SU$
- 2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
 - a. Name or ID of each solvent used in this emissions unit.
 - b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
 - c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from $i = 1$ to $i = n$, of $(WS)_i$, where:
 $i =$ subscript denoting a solvent, and
 $n =$ the number of different solvents.
 - d. The total operating days, "OD", in days per week.
 - e. The total operating hours, "OT", in hours per week.
 - f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:
 $WOC = TWS * EF$
 where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
 - g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:
 $DOC = WOC / OD$

h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:

$$\text{HOC} = \text{WOC} / \text{OT}$$

i. The rolling 52-week summations of OC emissions.

3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:

a. Name or ID for each HAP employed in this emissions unit.

b. The amount of each single HAP employed, "MH", in pounds per week.

c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:

$$\text{SHAPM} = (\text{MH} / \text{TWS}) * \text{WOC}$$

where, "WOC" and "TWS" are recorded in section C.2 of these terms and conditions.

d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from $i = 1$ to $i = n$, of (SHAP)_i,

where

i = subscript denoting a single HAP, and

n = the number of different single HAPs.

4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:

a. the emissions of each single HAP; and

b. the emissions of combined HAPs.

5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. An identification of each week during which the average OC emissions from this emissions unit exceeded 1.52 pounds per hour, and the actual average hourly OC emissions for each such week.

b. An identification of each week during which the average OC emissions from this emissions unit exceeded 36.48 pounds per day, and the actual average daily OC emissions for each such week.

c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.

d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.

e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.

2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.

3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.

4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitation:
 20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

b. Emissions Limitation:
 1.52 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of

these terms and conditions.

c. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

d. Emissions Limitation:
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

e. Emission Limitation:
1.44 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

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

a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

b. Emission Limitation:
9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation:
36.48 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

F. Miscellaneous Requirements

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:
A - F.

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Facility ID: 0243081231 Emissions Unit ID: P010 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>
Industrial Paint Dispenser System #10, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits: a. 1.55 pounds per hour and 1.44 tons per year of VOC; and b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

2. Additional Terms and Conditions

(a) The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
The organic compound emissions from this emissions unit shall not exceed 37.2 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following information each year to determine emission factor for this emissions unit:

- a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
- b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:

$$SP = PR * S\%$$
 where,
 PR = the annual production rate, in tons per year.
 S% = the average percentage of solvent in products, by weight.
- c. The waste solvent, in tons per year, to be defined as "WS".
- d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:

$$YOC = SU - SP - WS$$
- e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:

$$EF = YOC / SU$$

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
 - a. Name or ID of each solvent used in this emissions unit.
 - b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
 - c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from $i = 1$ to $i = n$, of (WS)_i, where:
i = subscript denoting a solvent, and
n = the number of different solvents.
 - d. The total operating days, "OD", in days per week.
 - e. The total operating hours, "OT", in hours per week.
 - f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:
 $WOC = TWS * EF$
where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
 - g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:
 $DOC = WOC / OD$
 - h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:
 $HOC = WOC / OT$
 - i. The rolling 52-week summations of OC emissions.
 3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
 - a. Name or ID for each HAP employed in this emissions unit.
 - b. The amount of each single HAP employed, "MH", in pounds per week.
 - c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:
 $SHAPM = (MH / TWS) * WOC$
where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
 - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from $i = 1$ to $i = n$, of (SHAP)_i,
where
i = subscript denoting a single HAP, and
n = the number of different single HAPs.
 4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
 - a. the emissions of each single HAP; and
 - b. the emissions of combined HAPs.
 5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 1.55 pounds per hour, and the actual average hourly OC emissions for each such week.
 - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 37.2 pounds per day, and the actual average daily OC emissions for each such week.
 - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
 - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
 - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
 2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
 3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.

4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).
 - b. Emissions Limitation:
1.55 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
 - c. Emission Limitation:
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.
 - d. Emissions Limitation:
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
 - e. Emission Limitation:
1.44 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - b. Emission Limitation:
9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - c. Emission Limitation:
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
 - d. Emissions Limitation:
37.2 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

F. Miscellaneous Requirements

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable:

A - F.