



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

04/06/06

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77 permit**

16-77-02-0039  
E. L. Stone Company, Inc.  
Mark Micire  
2998 Eastern Road  
Barberton, OH 44203-9412

Dear Mark Micire:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Akron Air Pollution Control.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Akron Air Pollution Control  
File, DAPC PIER



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 04/06/06

Effective Date: 04/27/06

Expiration Date: 04/27/11

This document constitutes issuance of a Title V permit for Facility ID: 16-77-02-0039 to:
E. L. Stone Company, Inc.
2998 Eastern Road
Barberton, OH 44203-9412

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units K001 through K018, all describing coating of miscellaneous metal, plastic, and rubber parts.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Akron Air Pollution Control  
146 South High Street, Room 904  
Akron, OH 44308  
(330) 375-2480

Ohio Environmental Protection Agency

A handwritten signature in black ink, reading "Joseph P. Koncelik". The signature is written in a cursive style with a large, looping initial "J".

Joseph P. Koncelik  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping and Reporting Requirements**

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V

permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. **Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. **Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 4. **Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## 5. **Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.  
(Authority for term: OAC rule 3745-77-07(A)(10))

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**19. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**2. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**5. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforceable Section

1. In order to avoid the requirements of 40 CFR Part 63, Subpart MMMM and Subpart PPPP, the permittee has voluntarily accepted the following facility-wide emission limitations:

24.9 tpy of combined hazardous air pollutant (HAP) emissions, on a rolling, 12-month basis; and

9.95 tpy of individual HAP emissions, on a rolling, 12-month basis.

To ensure these HAP emission limitations are met, the permittee has agreed to accept the following operational restrictions on annual coating usage and HAP content:

- a. The facility-wide annual High-HAP coating usage shall be limited to 1,400 gallons, based upon rolling, 12-month summations. The facility-wide annual Low-HAP coating usage shall be limited to 9,575 gallons based upon rolling, 12-month summations.
- b. Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.
- c. Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

[Authority for Term: OAC rule 3745-77-07(B)(1)]

2. The permittee shall submit annual reports that specify the total coating usage for this facility for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for Term: OAC rule 3745-77-07(B)(1)]

3. The permittee shall notify the Akron RAQMD, in writing, of any daily record showing that the individual HAP content or combined HAP content of any coating employed exceeds the limitations specified in section A.1 above. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(B)(1)]

4. The permittee shall notify the Akron RAQMD, in writing, of any monthly record showing that the rolling individual HAP summation or combined HAP summation exceeds the limitations specified in section A.1 above. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(B)(1)]

**B. State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P001 - natural gas-fired oven B1O1;  
Z019 - natural gas-fired oven B1O2;  
Z020 - natural gas-fired oven B1O3;  
Z021 - natural gas-fired oven B6O1;  
Z022 - natural gas-fired oven B6O2;  
Z023 - natural gas-fired oven B6O3;  
Z024 - electric oven B1EO1;  
Z025 - electric oven B1EO2;  
Z026 - electric oven B1EO3;  
Z027 - electric oven B1EO4;  
Z028 - electric oven B1EO5;  
Z029 - electric oven B1EO6;  
Z030 - natural gas-fired oven B2O1;  
Z031 - natural gas-fired oven B6O4;  
Z032 - electric oven B6EO2;  
Z033 - electric oven B6EO3;  
Z034 - electric oven B6EO4; and  
P002 - sandblasting area.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B1SB2 (K001)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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>
paint spray booth B1SB2 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lbs/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in Part III, section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in Part III, section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value.

NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B1SB2 with disposable paper filters to control particulate emissions		See section B.VI.1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B1SB3 (K002)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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>
paint spray booth B1SB3 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B1SB3 with disposable paper filters to control particulate emissions		See section B.VI.1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B1SB4 (K003)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray booth B1SB4 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The Owner/Operator shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

(Authority for term: OAC rule 3745-77-07(C)(1))

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B1SB4 with disposable paper filters to control particulate emissions		See section B.VI.1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B1SB5 (K004)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. 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>
paint spray booth B1SB5 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

(Authority for term: OAC rule 3745-77-07(C)(1))

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B1SB5 with disposable paper filters to control particulate emissions		See section B.VI.1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B2SB1 (K005)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray booth B2SB1 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.f** Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.g** Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**2.** Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B2SB1 with disposable paper filters to control particulate emissions		See section B.VI.1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B2SB2 (K006)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray booth B2SB2 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B2SB2 with disposable paper filters to control particulate emissions		See section B.VI.1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B2SB3 (K007)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B2SB3 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B2SB3 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B3SB1 (K008)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray booth B3SB1 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B3SB1 with disposable paper filters to control particulate emissions		See section B.VI.1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B1SB1 (K009)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B1SB1 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B1SB1 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB3 (K010)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B6SB3 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B6SB3 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K010) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB6 (K011)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B6SB6 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- 10.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B6SB6 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K011) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB5 (K012)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. 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>
paint spray booth B6SB5 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## **V. Testing Requirements (continued)**

### **1.f** Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### **1.g** Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### **2.** Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B6SB5 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B1SB7 (K013)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray booth B1SB7 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B1SB7 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB8 (K014)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B6SB8 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## **V. Testing Requirements (continued)**

### **1.f** Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### **1.g** Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### **2.** Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B6SB8 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB7 (K015)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B6SB7 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B6SB7 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B3SB2 (K016)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray booth B3SB2 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### IV. Reporting Requirements (continued)

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### V. Testing Requirements

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## **V. Testing Requirements (continued)**

### **1.f** Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### **1.g** Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### **2.** Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B3SB2 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB4 (K017)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B6SB4 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B6SB4 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB2 (K018)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B6SB2 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE-EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
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paint spray booth B6SB2 with  
disposable paper filters to control  
particulate emissions

See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K018) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B6SB1 (K019)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B6SB1 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B6SB1 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K019) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B1SB6 (K020)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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>
paint spray booth B1SB6 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each coating employed shall contain a total combined HAP content of less than 5.54 pounds per gallon, as applied, and an individual HAP content of less than 2.20 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B1SB6 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B2SB4 (K021)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray booth B2SB4 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B2SB4 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B2SB5 (K022)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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>
paint spray booth B2SB5 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B3SB7 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** B3SB3 (K023)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

**A. State and Federally Enforceable Section**

**I. 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>
paint spray Booth B3SB3 with disposable paper filters to control particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

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

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

#### 1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

**1.a Emission Limitations:**

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b Emission Limitation:**

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.d** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

**1.e** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.g Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray Booth B3SB3 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B3SB4 (K024)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B3SB4 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B3SB4 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K024) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B3SB5 (K025)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B3SB5 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY-WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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.

<b><u>Operations, Property, and/or Equipment</u></b>	<b><u>Applicable Rules/ Requirements</u></b>	<b><u>Applicable Emissions Limitations/Control Measures</u></b>
paint spray booth B3SB5 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K025) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** B3SB6 (K026)

**Activity Description:** Coating of miscellaneous metal, plastic, and rubber parts.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
paint spray booth B3SB6 with disposable paper filters to control particulate emissions	OAC rule 3745-31-05(A)(3) (PTI 16-02252)	Emissions of organic compounds shall not exceed 7.3 tpy.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-09(U)(2)(e).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions from this emissions unit shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(2)(e)(ii)	<p>This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.</p> <p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the volatile organic compounds (VOC) content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average, pursuant to OAC rule 3745-21-09(U)(1)(d), and the 3.0 gallons per day limitation will no longer be applicable.</p>

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. Prior to commencing operation of the paint spray booth for each shift, the permittee shall ensure the exhaust filters are in place and in good condition. The permittee shall also ensure the filters are operated and maintained in accordance with the manufacturer's specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 16-02252]

2. High performance architectural aluminum coatings shall meet the following definition:

A high performance architectural aluminum coating means a coating that is applied to aluminum used in architectural subsections and that meets the requirements of publication number AAMA 605.2-1985 of the "Architectural Aluminum Manufacturer's Association."

[Authority for term: OAC rule 3745-21-01(D)(28)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall identify each type of substrate coated (nonmetal, metal, or both) for each day during which the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain a record for each day for this emissions unit of whether or not the disposable paper filters were in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 3. RECORD KEEPING REQUIREMENTS FOR NONMETAL PARTS COATING

The permittee shall collect and record the following information each day for the coating line when nonmetal parts are coated:

- a. the company identification for each nonmetal coating and cleanup material employed;
- b. documentation on whether or not each nonmetal coating and cleanup material is a photochemically reactive material;
- c. the number of gallons of each nonmetal coating, photochemically reactive cleanup material, and non-photochemically reactive cleanup material employed;
- d. the organic compound content of each nonmetal coating and cleanup material, in pounds per gallon;
- e. the organic compound emission rate for each nonmetal coating and cleanup material, in pounds per day;
- f. the total organic compound emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation during the coating of nonmetal parts; and
- i. the average hourly organic compound emission rate for all nonmetal coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 4. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.5 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating employed;
- b. the volume, in gallons, of each metal coating employed; and
- c. the total volume, in gallons, of all of the metal coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

#### 5. RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each day for the coating line when metal parts are coated:

- a. the name and identification number of each metal coating, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each metal coating, as applied; and
- c. the daily volume-weighted average VOC content of all metal coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### 6. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION

NOTE: The record keeping requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the record keeping requirements contained in section A.III.7 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon;
- d. the VOC content of each coating, as applied, in pounds per gallon; and
- e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**III. Monitoring and/or Record Keeping Requirements (continued)**

**7. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The record keeping requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material, in pounds per gallon; and
- d. the total VOC emissions from all cleanup materials, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**8. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each day for the purpose of determining annual HAP emissions:

- a. the name and identification of each coating employed;
- b. the number of gallons of each coating employed;
- c. the individual HAP content of the worst case HAP in the formulation of each coating employed, in pounds per gallon; and
- d. the total HAP emissions from all coatings employed, in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

**9. ADDITIONAL RECORD KEEPING REQUIREMENTS FOR DEMONSTRATING COMPLIANCE WITH THE VOLUNTARY FACILITY WIDE EMISSION LIMITATIONS AND OPERATIONAL RESTRICTIONS**

The permittee shall collect and record the following information each month for the purpose of determining annual HAP emissions:

- a. the total amount of High-HAP coating employed for the month in this emissions unit, in gallons;
- b. the total amount of Low-HAP coating employed for the month in this emissions unit, in gallons;
- c. the total amount of coating employed for the month in the facility, in gallons;
- d. the total facility-wide rolling, cumulative total amount of High-HAP coating employed for the rolling, 12-month period, in gallons
- e. the total facility-wide rolling, cumulative total amount of Low-HAP coating employed for the rolling, 12-month period, in gallons
- f. the total facility-wide rolling, cumulative total amount of coating employed for the rolling, 12-month period, in gallons; and
- g. the total facility-wide rolling, cumulative total HAP emissions for the rolling, 12-month period, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 16-2252, issued on 2/6/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

### IV. Reporting Requirements

**1. REPORTING REQUIREMENTS FOR NONMETAL PARTS COATING**

The permittee shall submit deviation (excursion) reports to the Akron RAQMD that include the following information:

- a. an identification of each day during which the average hourly organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and
- b. an identification of each day during which the organic compound emission rate (from nonmetal coatings and photochemically reactive cleanup materials) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

#### **IV. Reporting Requirements (continued)**

**2. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE 3 GALLONS OF COATING/DAY LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the emissions unit does not employ more than 3 gallons of coating on metal parts in any given day. If any record shows that this emissions unit employs more than 3 gallons of coating on metal parts in any given day, thereafter, the reporting requirements contained in section A.IV.3 of this permit shall apply and the 3 gallons per day limitation and associated record keeping and reporting will no longer be applicable.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**3. REPORTING REQUIREMENTS FOR METAL PARTS COATING SUBJECT TO THE VOC CONTENT LIMITATION**

NOTE: The reporting requirements contained in this part shall only apply if the 3 gallons per day limitation has been exceeded.

The permittee shall notify the Akron RAQMD in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. This reporting requirement may also be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.**

[Authority for term: OAC rule 3745-77-07(C)(1)]

**5. The permittee shall notify the Akron RAQMD in writing of any record showing that the disposable paper filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days after the event occurs.**

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-02252]

**6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.**

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:

Emissions of organic compounds resulting from the coating of nonmetal parts shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC rule 3745-21-01(C)(5)) are employed in this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation of 8 pounds per hour shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

Compliance with the emission limitation of 40 pounds per day shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.b** Emission Limitation:

This emissions unit shall not employ more than 3.0 gallons of coating on metal parts in any given day.

Applicable Compliance Method:

Compliance with the coating usage limitation of 3.0 gallons per day shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.c** Emission Limitation:

If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed 3.5 pounds of VOC per gallon (excluding water and exempt solvents) as a daily, volume-weighted average.

Applicable Compliance Method:

Compliance with the VOC content limitation of 3.5 pounds of VOC per gallon of coating shall be based upon the record keeping requirements specified in section A.III.5 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

7.3 tpy of organic compound emissions

Applicable Compliance Method:

Total annual organic compound emissions shall be the sum of part (a) and part(s) (b) and/or (c) below, as appropriate.

a. Annual organic compound emissions from nonmetal parts coating:

Sum the daily organic compound emission rates for each nonmetal coating and cleanup material (recorded pursuant to section A.III.3.e of this permit) for the calendar year.

b. Annual organic compound emissions from metal parts coating subject to the 3 gallons of coating/day limitation (if applicable):

Sum the monthly organic compound emissions (recorded pursuant to section A.III.6.e of this permit) for the calendar year. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

c. Annual organic compound emissions from metal parts coating subject to the VOC content limitation (if applicable):

Multiply the VOC content (excluding water and exempt solvents) by the number of gallons (excluding water and exempt solvents) of each metal coating, as applied (recorded pursuant to section A.III.5.b of this permit). Add the total VOC emissions from all cleanup materials (recorded pursuant to section A.III.7.d of this permit) to this value. NOTE: VOC emissions shall be considered "organic compound emissions" when calculating organic compound emissions for annual fee emission reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**1.e** Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (lbs/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

### 1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

### 1.g Operational Restriction:

The maximum annual coating usage for this facility shall not exceed 10,975 total gallons (1,400 gallons High-HAP, and 9,575 gallons Low-HAP), based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit. The summation of these records shall be used to document compliance with the annual facility-wide coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 1.h Operational Restriction:

Each High-HAP coating employed shall contain a total combined HAP content of less than 6.50 pounds per gallon, as applied, and an individual HAP content of less than 2.50 pounds per gallon, as applied.

Each Low-HAP coating employed shall contain a total combined HAP content of less than 4.25 pounds per gallon, as applied, and an individual HAP content of less than 1.70 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations shall be based upon the record keeping requirements specified in sections A.III.8 and A.III.9 of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 2. Formulation data or USEPA Method 24 shall be used to determine the HAP, organic compound or VOC content of the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### 3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 16-02252, issued on 2/6/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. 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>
paint spray booth B3SB6 with disposable paper filters to control particulate emissions		See section B.VI.I.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

## VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K026) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model ( or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Methyl Ethyl Ketone  
TLV (mg/m<sup>3</sup>): 588.9 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 1.8\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 300.75  
MAGLC (ug/m<sup>3</sup>): 14,042.8

Pollutant: Methyl Isobutyl Ketone  
TLV (mg/m<sup>3</sup>): 204.8 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 0.11\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 17.06  
MAGLC (ug/m<sup>3</sup>): 4,876.2

Pollutant: Toluene  
TLV (mg/m<sup>3</sup>): 188 (Converted from the TWA)  
Maximum Hourly Emission Rate (lbs/hr): 4.2\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 698.6  
MAGLC (ug/m<sup>3</sup>): 4,476.2

\* This was modeled for emissions units K010, K011, K017, K018, K019, and K024 through K026 combined.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

## **VI. Miscellaneous Requirements (continued)**

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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