

Facility ID: 0278000655 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0278000655 Emissions Unit ID: F002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
blasting operation cleaning of metal using steel shot/steel grit with baghouse control system	OAC rule 3745-31-05(A)(3) (PTI 02-19690)	Particulate emissions (PE) shall not 3.0 pounds per hour and 13.1 tons per year.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-11	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(1)(e).
		The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range either, established during the performance test while the emissions unit is in operation, or recommended by the manufacturer.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;

- b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range established in the operational restriction above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

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

Emission Limitations:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible particulate emission limitations shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the procedures specified in OAC rule 3745-17-03(B)(1) and (B)(3), as appropriate.

Emission Limitation:

PE shall not exceed 3.0 lbs/hr.

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using the emission factor from AP-42, Section 13.2-1 (1997 update) for sandblasting (27 lbs/1000 lbs abrasive), and the maximum abrasive usage weight rate from the application.

$E(PE)_{\text{blasting}} = 27 \text{ lbs}/1000 \text{ lbs abr.} \times \text{max. abrasive usage weight rate, in lbs/hr} \times \text{control efficiency}$

where:

control efficiency is estimated at 98% or (1-.98 for the formula).

If required, compliance shall be demonstrated as specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

PE shall not exceed 13.1 tons/yr.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (3.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

F. Miscellaneous Requirements

1. None

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Part II - Special Terms and Conditions

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law

only with the exception of those listed below which are federally enforceable.

- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
tank painting operation	OAC rule 3745-31-05(A)(3) (PTI 02-11891) OAC rule 3745-21-09(U)(1)(c)	Volatile organic compounds (VOC) emissions shall not exceed 20.5 tons per year. Volatile organic compounds (VOC) emissions shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

- 2. **Additional Terms and Conditions**

- (a) None

B. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating and cleanup material, as applied; and
 - c. the total VOC emissions from all the coatings and cleanup materials employed, in pounds.
- 2. The permittee shall collect and record the following information each day that a non compliant coating is used for this emissions unit:
 - a. the name and identification of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 4. The permit to install for this emissions unit [K001] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 2.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 788
 MAGLC (ug/m3): 110,333

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air

toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which any daily record shows that the daily volume-weighted average VOC content(s) exceeded the applicable limitation, and the actual daily volume-weighted average VOC content(s) of each such day(s).

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

E. Testing Requirements

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

VOC emissions shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Emission Limitation:

VOC emissions shall not exceed 20.5 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the monthly record keeping requirement specified in section C.1.c of this permit for each calendar month, and then dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

1. None

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Part II - Special Terms and Conditions

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
small tank painting operation	OAC rule 3745-31-05(A)(3) (PTI 02-21346)	Volatile organic compound (VOC) emissions shall not exceed 55.4 pounds per day, on a monthly average basis, and 10.63 tons per year.

OAC rule 3745-21-09(U)(1)(c)

VOC emissions shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating and cleanup material, as applied;
 - c. the total VOC emissions from all the coatings and cleanup materials employed, in pounds;
 - d. the total days of operation of the coating line each month; and
 - e. the average daily VOC emission rate in pounds of VOC per day (this shall be calculated by dividing (c) by (d) for each month).
2. The permittee shall collect and record the following information each day that a noncompliant coating is used for this emissions unit:
 - a. the name and identification of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month that the average VOC emissions from the coatings and cleanup materials exceeded 55.4 pounds per day in this emissions unit, and the actual average OC emissions for each such month; and
 - b. an identification of each day during which any daily record shows that the daily volume-weighted average VOC content(s) exceeded the applicable limitation, and the actual daily volume-weighted average VOC content (s) of each such day(s).

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

E. **Testing Requirements**

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

VOC emissions shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average, for all coatings.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
Emission Limitation:

VOC emissions shall not exceed 55.4 pounds per day, on a monthly average basis.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.

Emission Limitation:

VOC emissions shall not exceed 10.63 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the monthly record keeping requirement specified in section C.1.c of this permit for each calendar month and then dividing by 2000 lbs/ton.

F. **Miscellaneous Requirements**

1. None