

Facility ID: 0278080137 Issuance type: Final State Permit To Operate

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

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

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

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit N001](#)
- [Go to Part II for Emissions Unit P006](#)

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Facility ID: 0278080137 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
paint spray booth	OAC rule 3745-31-05(A)(3) (PTI No. 02-7920) OAC rule 3745-21-09(U)	See section A.2.a and b. below. The emission limitation specified by this rule is less stringent than or equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The maximum daily coating usage in this emissions unit shall not exceeding 10 gallons of coating in any one day.
The volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 54.0 pounds of per day and 9.85 tons per year.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the VOC content of each coating, thinner, and cleanup material (excluding water and exempt solvents), as applied;
 - c. the number of gallons (excluding water and exempt solvents), of each coating, thinner, and cleanup material employed;
 - d. the total number of gallons, of all coating materials employed; and
 - e. the total VOC emissions from all coating, thinner, and cleanup material employed, in pounds, the sum of b. times c.

D. Reporting Requirements

1. The permittee shall notify the Director (the Northeast Ohio EPA District Office) in writing of any daily record showing that the coating line emitted more than the allowable daily emission rate. The notification shall include a copy of such record and shall be sent to the Director (the Northeast Ohio EPA District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) 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 Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports which 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 limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

VOC emissions shall not exceed 54 pounds per day.

Applicable Compliance Method:

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

The maximum daily coating usage shall not exceed 10 gallons per day of coating material.

Applicable Compliance Method:

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

VOC emissions shall not exceed 9.85 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the daily VOC emissions from the record keeping requirement specified in section C.1.e, divided by 2000 lbs/ton.

F. Miscellaneous Requirements

1. None

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

Facility ID: 0278080137 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
varnish dip/bake line	OAC rule 3745-31-05(A)(3) (PTI No. 02-6976) OAC rule 3745-21-09(U)(1)(a)	See section A.2.a and b. below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average, for clear coatings.
The VOC emissions shall not exceed 40.0 pounds of per day, on a monthly average and, 7.3 tons per year.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;

- b. the VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied;
- c. the number of gallons (excluding water and exempt solvents) of each coating and cleanup material, as applied;
- d. the total VOC emissions from all the coatings and cleanup materials employed, in pounds, the sum of b. times c.;
- e. the total days of operation of the coating line each month; and
- f. the average daily VOC emission rate in pounds of VOC per day. This shall be calculated by dividing d. by e. for each month.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify each month where the average daily VOC emission rate exceeded 40 pounds per day for this emissions unit .The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports which 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 limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

VOC emissions shall not exceed 4.3 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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

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 4.3 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 40 pounds per day, based on an average for each calendar month.

Applicable Compliance Method:

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

VOC emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the monthly VOC emissions from the record keeping requirement specified in section C.1.d, divided by 2000 lbs/ton.

F. Miscellaneous Requirements

1. None

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Facility ID: 0278080137 Emissions Unit ID: N001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Bayco heat cleaning oven	OAC rule 3745-31-05(A)(3) (PTI No. 02-7127)	Particulate emissions (PE) shall not exceed 0.11 lb per hour and 0.48 ton per year. PE shall not exceed 0.20 lb per 100 lbs of charge. Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed five (5) percent opacity, except for 6-minutes in any continuous 60-minute period during which the opacity shall not exceed 20%.
	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-09(B)	The emission limitation specified by this rule is less stringent than or equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

(a) The annual particulate emission limitation specified above represents this emissions unit's potential to emit. Therefore, no annual records are required to determine compliance with this limitation.

B. Operational Restrictions

1. The afterburner must be operated at a temperature of at least 1,400 degrees Fahrenheit at all times during which this emission unit is operated as a burn off incinerator. The afterburner shall be pre-heated thirty minutes (or a time established during compliance testing) prior to ignition of charge and continued in use during the entire burn cycle.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature, in degrees Fahrenheit, of the afterburner when the emissions unit is operated as a burn off incinerator. The monitoring and recording device shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. All temperature records shall be maintained by the permittee for a period of at least two years and shall be made available for inspection by Ohio EPA during normal business hours.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any records showing all periods of time that this emissions unit was operated in the burn off mode while the combustion temperature of the afterburner was less than 1,400 degrees Fahrenheit;. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days following the end of the calendar month.

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:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 5% opacity, except for six minutes in any 60 minute period during which opacity shall not exceed 20% opacity.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

Emission Limitation:

PE shall not exceed 0.11 lb per hour and 0.20 pound per 100 pounds of material charged.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

Emission Limitation:

PE shall not exceed 0.48 TPY.

Applicable Compliance Method:

Compliance with the annual particulate emission limitation specified above shall be assumed as long as

compliance with the hourly particulate emission limitation is maintained.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 0278080137 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
shot blast room with baghouse	OAC rule 3745-31-05(A)(3) (PTI No. 02-3763)	Particulate emissions (PE) shall not exceed 2.0 pounds per hour and 6.2 tons per year.
	OAC rule 3745-17-07(A)(1)	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 3745-17-11(A)	The emission limitations specified by this rule are less stringent than or equal to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. 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 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 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 eliminate the visible emissions.

D. Reporting Requirements

- 1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective action(s) taken to eliminate the visible 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 six-month period.

E. Testing Requirements

- 1. Compliance with the emissions limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

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.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

Emission Limitation:

PE shall not exceed 2.0 lbs/hr and 6.2 tons/yr.

Applicable Compliance Method:

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

$E(\text{PE})_{\text{blasting}} = 27 \text{ lbs}/1000 \text{ lbs abr.} \times 1000 \text{ lbs/hr} \times \text{control efficiency,}$

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

Tons per year is determined by multiplying $E(\text{PE})_{\text{total}}$ in lbs/hr by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

F. Miscellaneous Requirements

1. None