

Facility ID: 0278080757 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 0278080757 Emissions Unit ID: V100 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 line for clear coating of iron pipe	OAC rule 3745-31-05(A)(3) (PTI No. 02-12563)	See Section A.2.a.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
	OAC rule 3745-35-07(B)	93.0 tons per year volatile organic compounds (VOC) from all coatings and cleanup materials, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-09(U)(1)(a)	See Sections A.2.b and A.2.c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B).

**2. Additional Terms and Conditions**

- (a) The VOC emissions from the coatings employed in this emissions unit shall not exceed 1176 pounds of VOC per day.  
The VOC content of coatings shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.  
Hazardous Air Pollutant (HAP) emissions from this emissions unit shall not exceed:
  - i. 9.9 tons/year\* of any individual HAP; and
  - ii. 24.9 tons/year\* of total combined HAPs.

\* based upon a rolling, 12-month summation of the monthly emissions  
If the rolling, 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and this emissions unit must comply with the requirements for a major source per 40 CFR Part 63, Subpart M, within 365 days after the exceedance. As a major source of HAPs, the facility shall also be subject to Title V permitting requirements.

**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 day for the line:
  - a. the name and identification number 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 total VOC emissions from all the coating materials employed, in pounds.
- 2. 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.
- 3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the total VOC emissions from all coatings and cleanup materials employed, in tons; and
  - e. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed (i.e., sum the monthly VOC emissions for the current month plus the previous 11-month period).
- 4. The permittee shall collect and record the following information each month:
  - a. the name and identification number of each coating, as applied;
  - b. the individual HAP content for each HAP of each coating, as applied, as a weight fraction;
  - c. the total combined HAP content for each coating, as applied, as a weight fraction (i.e., sum all the individual HAP contents from b);
  - d. the number of gallons of each coating employed;
  - e. the density of each coating employed;
  - f. the name and identification of each cleanup material employed;
  - g. the individual HAP content for each HAP of each cleanup material, as applied, as a weight fraction;
  - h. the total combined HAPs content of each cleanup material, as applied, as a weight fraction (i.e., sum all the individual HAP contents from g);
  - i. the number of gallons of each cleanup material employed;
  - j. the density of each cleanup material, as employed;
  - k. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons (i.e., for each HAP, the sum of (b) times (d) times (e) for each coating plus the sum of (g) times (i) times (j) for each cleanup material);
  - l. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons (i.e., the sum of (c) times (d) times (e) for each coating plus the sum of (h) times (i) times (j) for each cleanup material); and
  - m. the rolling, 12-month individual HAP emissions (for each HAP) and the rolling, 12-month combined HAPs emissions from all coatings and cleanup materials employed, in tons.  
A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets or VOC data sheets typically include a listing of the solvents contained in the coatings or cleanup materials.
- 5. If the permittee uses only coatings and cleanup materials that contain no HAPs in a given month, the permittee shall note this fact with the VOC required records of Section C.3.

**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 (for VOC content). 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 following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports that identify any day when the VOC emission rate exceeded 1176 pounds per day. Each report shall specify each such day's emission rate and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
- 3. 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.
- 4. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the rolling 12-month summation of the monthly VOC emissions from this emissions unit exceeded 93.0 tons per year.
- 5. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of:
  - a. the individual HAP emission limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
  - b. the total combined HAP emission limitation from all coatings and cleanup materials employed, in pounds or

tons per rolling, 12-month period.

6. The quarterly deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

3.5 lbs of VOC per gallon coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1. The VOC contents of the coating materials shall be based upon U.S. EPA Method 24 or formulation data.

Emission Limitation:

1176 pounds of VOC per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1.

Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulates, the following equation shall be used:

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

Where,

E = particulate emission rate (lb/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

CE = control efficiency of the control equipment

If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Emission Limitation:

20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be based upon visible emission observations performed in accordance with U.S. EPA Method 9.

Emission Limitation:

93.0 tons per year VOC

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3 of this permit.

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

Emission Limitations:

9.9 tons/year of any individual HAP

24.9 tons/year of total combined HAPs

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.4.

Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.