

Facility ID: 0285000460 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: 0285000460 Emissions Unit ID: R001 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>
Wood furniture coating operation consisting of dry overspray filters and one manual air spray gun. Parts are manually moved and air dried.	OAC rule 3745-31-05(A)(3) (PTI 02-22663 Effective 10/16/2007)	See A.2.a , A.2.b and A.c below.
	OAC rule 3745-17-11(C)	See A.2.d below.

2. **Additional Terms and Conditions**
 - (a) The volatile organic compound (VOC) emissions from all the coatings shall not exceed 4.49 pounds per hour. [This limit is based upon the maximum application rate of 0.84 gallon per hour.]
The VOC content of each coating shall not exceed 5.35 pounds per gallon, as applied.
The VOC emissions from all the coatings and cleanup materials shall not exceed 23.8 tons per year.
The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

B. Operational Restrictions

1. The permittee shall operate and maintain the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee.

The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and

any necessary maintenance or repairs were completed.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee.

These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

2. The permittee shall collect and record the following information for each day:
 - a. the company identification for each coating or cleanup material employed;
 - b. the volatile organic compound (VOC) content of each coating, in lbs/gallon, as applied;
 - c. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - d. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (b);
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all the coatings, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the volatile organic compound (VOC) content of each cleanup material, in lbs/gallon; and
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a).
4. The permittee shall calculate and record the total VOC emissions from all the coatings and cleanup materials employed, in tons per calendar year; [i.e., (the summation of the daily VOC emissions, from section C.2.d, for the calendar year + the monthly cleanup material VOC emission from section C.3.c) divided by 2000 lbs/ton].

D. Reporting Requirements

1. The permittee submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the allowable in pounds per gallon, and the actual VOC content of each such coating employed; and
 - c. any daily record showing that the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC from this emissions unit. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.
3. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Limitation:
VOC emissions shall not exceed 4.49 pounds hour .

Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in Section C.2 of this permit.

Emissions Limitation:
VOC emissions shall not exceed 23.8 tons per year from all the coatings and cleanup materials.

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section C.4 of this permit.

Emissions Limitation:
VOC content shall not exceed 5.35 pounds per gallon coating, as applied.

Applicable Compliance Method:
Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-15(I)(4), the permittee shall determine the composition of the coatings by using a certified product data sheet that provides data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.