

Facility ID: 0285010083 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: 0285010083 Emissions Unit ID: R006 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>
one 11 ft x 11 ft x 10 ft coating booth for application of adhesive glue to miscellaneous metal parts and metal furniture by brush, equipped with exhaust filters.	OAC rule 3745-31-05(A)(3) (PTI # 02-19132)	less than 15 lbs VOC per day for coating metal furniture (see section A.2.a).  maximum usage of 10 gallons coating per day for coating metal furniture and miscellaneous metal parts  54.1 lbs VOC per day and 9.9 tons VOC per year for coating metal furniture and miscellaneous metal parts  18.9 lbs VOC per month from cleanup materials  0.1 ton VOC per year from cleanup materials  (See section A.2.b). exempt (see section A.2.c). exempt (see section A.2.d). See section A.2.e.
	OAC rule 3745-21-09(I)(3)(a)	
	OAC rule 3745-21-09(U)(1)(d)	
	40 CFR Part 60, Subpart EE	

**2. Additional Terms and Conditions**

- (a) The 15 lbs of VOC per day limit when coating metal furniture is for all metal furniture coating lines, in combination, at the facility. The emissions from this emissions unit (R006) in combination with emissions unit R003 shall not exceed the following:
  - i. 9.9 tons per year of any individual hazardous air pollutant (HAP); and
  - ii. 24.5 tons per year of total aggregate HAPs.  
OAC rule 3745-21-09(I)(3)(a) states that the requirements of OAC rule 3745-21-09(I)(1) shall not apply if all prime coat, topcoat, or single coat coating lines for metal furniture, in combination, at the facility emit less than 15 lbs of VOC per day.  
OAC rule 3745-21-09(U)(2)(e)(iii) states that the requirements of OAC rule 3745-21-09(U)(1) shall not apply when coating miscellaneous metal parts when no more than ten gallons are used per day.  
If the permittee uses less than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and keeps purchase or inventory records or other data necessary to substantiate annual coating usage, the permittee shall be exempt from all other provisions of Subpart EE, 40 CFR 60.313.  
  
If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and thereafter the permittee shall emit no more than 0.90 kilogram of VOC per liter of coating solids applied, based on a monthly volume-weighted average.

**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, and all other

metal furniture coating lines at the facility, when coating metal furniture:

- 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 of each coating (excluding water and exempt solvents), as applied;
  - c. the VOC emissions, in pounds per day, from the coatings employed in this emissions unit only, as calculated by the following equation:
 

T furniture = the sum of the product of A times B for each coating applied.

A furniture = mass of VOC per volume of coating (excluding water and exempt solvents), as applied, in units of pounds VOC per gallon,

B furniture = volume of coating (excluding water and exempt solvents), as applied, in units of gallons per day; and
  - d. the total VOC emissions, in pounds per day, from the coatings employed in this emissions unit in addition to the VOC emissions from other metal furniture coating operations at the facility. The other VOC emissions are also calculated using the equation above, in C.1.c.
2. The permittee shall collect and record the following information each day for this emissions unit, when coating miscellaneous metal parts:
    - 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 of each coating (excluding water and exempt solvents), as applied; and
    - c. the total VOC emissions, in pounds per day, from the coatings employed as calculated by the following equation:
 

T misc metal = the sum of the product of A times B for each miscellaneous metal furniture coating applied,

A misc metal = mass of VOC per volume of coating (excluding water and exempt solvents), as applied, in units of pounds VOC per gallon,

B misc metal = volume of coating (excluding water and exempt solvents), as applied, in units of gallons per day.
  3. The permittee shall collect and record the following information each day for this emissions unit, when coating both metal furniture and miscellaneous metal parts:
    - a. the total VOC emissions, in pounds per day, from the coating of both metal furniture and miscellaneous metal parts as calculated by the summation of the totals calculated in sections C.1.c and C.2.c above; and
    - b. the total number of gallons used for coating both metal furniture and miscellaneous metal parts, as calculated by the summation of the recorded numbers in sections C.1.b and C.2.b.
  4. 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 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 employed, in pounds per month, calculated by the following equation:
 

Tc = the sum of the product of A times B for each cleanup material employed,

Ac = mass of VOC per volume of cleanup material employed,

Bc = volume of cleanup material employed, in units of gallons per day.
  5. The permittee shall collect and record the following information each month for this emissions unit, in combination with R003:
    - a. the name and identification number of each coating, as applied;
    - b. the individual hazardous air pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
    - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (5.b) above);
    - d. the number of gallons of each coating employed;
    - e. the name and identification of each cleanup material employed;
    - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
    - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup

material, as applied (sum all the individual HAP contents from (5.f) above);

- h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of (5.b) times (5.d) for each coating and the sum of (5.f) times (5.h) for each cleanup material); and
  - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of (5.c) times (5.d) for each coating plus the sum of (5.g) times (5.h) for each cleanup material).
6. A listing of the 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 typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
7. If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings per year, during that year and thereafter if the permittee uses a non-complying coating during any month, the permittee shall maintain the following monthly records for all the metal furniture coatings:
- a. the identification of each coating;
  - b. the volume of each coating consumed, as received (liters) [B];
  - c. the density of each coating, as received (kilograms per liter)[C];
  - d. the proportion of VOC in each coating, as received (fraction by weight) [D];
  - e. the volume of each VOC-solvent diluent added to each coating (liter) [E];
  - f. the density of each diluent VOC-solvent (kilograms per liter) [F];
  - g. the mass of VOC used during each month [G], i.e.,  $G = (B_i)(C_i)(D_i) + \dots (B_n)(C_n)(D_n) + (E_i)(F_i) + \dots (E_n)(F_n)$ , where: n = the total number of surface coatings employed in the emissions unit during the month; and i = subscript denoting a specific coating employed;
  - h. the proportion of solids in each coating, as received (fraction by volume) [H];
  - i. the total volume of coating solids used in each calendar month [I]; i.e.,  $I = (B_i)(H_i) + \dots (B_n)(H_n)$ ;
  - j. the transfer efficiency (fraction) [J] as specified in Table 1 of 40 CFR 60.313, Subpart EE; and
  - k. the average VOC emissions per unit volume of coating solids applied [K]; i.e.,  $K = G/(I)(J)$ .

The permittee shall conduct an initial compliance test for any new metal furniture coatings brought into the facility and used to coat metal furniture. The initial compliance test shall be performed in accordance with the requirement in 40 CFR 60, Subpart EE.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this emissions unit:
  - a. an identification of each day during which the VOC emissions from all metal furniture coating lines at the facility exceeded 15 pounds per day;
  - b. an identification of each day during which more than ten (10) gallons of coating was used for coating metal furniture and miscellaneous metal parts;
  - c. an identification of each day during which the calculated VOC emission rate when coating metal furniture and miscellaneous metal parts exceeded 54.1 pounds per day; and
  - d. an identification of each month during which the calculated VOC emission rate from cleanup materials exceeded 18.9 pounds per month.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of:
  - a. the total individual HAP emission limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and 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 month and pounds or tons per rolling, 12-month period.
4. The permittee shall submit annual reports that specify the amount of metal furniture coatings used during each calendar year (i.e., January 1 through December 31). The report may include purchase or inventory records or other data necessary to document the annual metal furniture coating usage. The annual reports shall be submitted by January 31 of each year for the previous calendar year.
5. If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per year, the permittee shall notify the Ohio EPA, Northeast District Office in writing of this and shall document any exceedances of Subpart EE during that year and any subsequent months. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northeast District Office within 45 calendar days after the exceedance occurs.

6. The permittee shall also submit annual reports that specify the total VOC emissions from coating metal furniture and miscellaneous metal parts and the total VOC emissions from cleanup materials. The reports shall be submitted by January 31 of each year for the previous calendar year.

**E. Testing Requirements**

1. Emission Limitation:  
Less than 15 lbs VOC per day when coating metal furniture  
  
Applicable Compliance Method:  
Compliance with the above limitation shall be determined based on the record keeping specified in section C.1.d.
2. Emission Limitation:  
54.1 pounds VOC per day and 9.9 tons VOC per year when coating metal furniture and miscellaneous metal parts.  
  
Applicable Compliance Method:  
Compliance with the daily VOC limit shall be determined based on the record keeping specified in section C.3.a.  
  
Compliance with the annual VOC limit when coating metal furniture and miscellaneous metal parts shall be determined by the summation of each daily VOC emission during a calendar year. This number is then multiplied by ton/2,000 pounds so that the annual emission may be reported in terms of tons per year.
3. Emission Limitation:  
18.9 pounds VOC per month and 0.1 ton VOC per year from cleanup materials.  
  
Applicable Compliance Method:  
Compliance with the monthly VOC limit shall be determined based on the record keeping specified in section C.4.d.  
  
Compliance with the annual VOC limit (from cleanup materials) shall be determined by the summation of each monthly VOC emission during a calendar year. This number is then multiplied by ton/2,000 pounds so that the annual emission may be reported in terms of tons per year.
4. Emission Limitations:  
9.9 tons per year of any individual hazardous air pollutant (HAP); and 24.5 tons per year of total aggregate HAPs from this emissions units and R003 shall not be exceeded.  
  
Applicable Compliance Method:  
Compliance shall be determined based on the record keeping specified in sections C.5.i and C.5.j.

**F. Miscellaneous Requirements**

1. None