

Facility ID: 0285010310 Issuance type: Final State Permit To Operate

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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 R001](#)
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[Go to Part II for Emissions Unit R003](#)

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Facility ID: 0285010310 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>
paint booth no.1 with dry exhaust filters and multiple spray guns	OAC rule 3745-31-05(A)(3) (PTI # 02-18667)	less than 15 lbs VOC per day when coating metal furniture (see section A.2.a)
		maximum usage of 10 gallons coating per day for coating metal furniture and miscellaneous metal parts
		58.1 lbs VOC per day and 10.6 tons VOC per year when coating miscellaneous metal parts
		101.1 lbs VOC per month and 0.62 ton VOC from cleanup materials
		Visible emissions shall not exceed 5% opacity, as a six-minute average, except as provided by rule.
		Particulate emissions shall not exceed 0.551 lb per hour and 2.4 tons per year
		Exempt. See section A.2.b.
	OAC rule 3745-21-09(I)(3)(a)	Exempt. See section A.2.c.
	OAC rule 3745-21-09(U)(1)(d)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	See section A.2.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 at the facility.
 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 requirement 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.

The emissions from emissions units R001, R002 and R003 shall not exceed:

- i. 9.9 tons per year of any individual hazardous air pollutant (HAP); and
- ii. 24.5 tons per year of total aggregate HAPs

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, as appropriate:
 - 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 total VOC emissions, in pounds per day, from the coatings employed for coating miscellaneous metal parts as calculated by the following equation:

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

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

B = 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 for coating metal furniture as calculated by the following equation:

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

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

B = volume of coating (excluding water and exempt solvents), as applied, in units of gallons per day.
2. The permittee shall collect and record the following information each month for this emissions unit, and all other coating lines at the facility, as appropriate:
 - 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, in pounds VOC per gallon,

Bc = volume of cleanup material employed, in gallons per month.
3. The permittee shall collect and record the following information each month for R001, R002, and 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 (3.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 (3.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 (3.b) times (3.d) for each coating and the sum of (3.f) times (3.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 (3.c) times (3.d) for each coating plus the sum of (3.g) times (3.h) for each cleanup material).

4. 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.
 5. The permittee shall perform monthly 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.
 6. 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., $K = G/(I)(J)$.
 7. 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 when coating miscellaneous metal parts exceeded 58.1 pounds per day; and
 - d. an identification of each month during which the calculated VOC emission rate from cleanup materials exceeded 101.1 pounds per month.
 2. 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 emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
 3. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
 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 miscellaneous metal parts and from use of cleanup materials during the calendar year. 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:
58.1 pounds VOC per day and 10.6 tons VOC per year when coating miscellaneous metal parts.

Applicable Compliance Method:
Compliance with the daily VOC limit shall be determined based on the record keeping specified in section C.1.c. Compliance with the annual VOC limit when coating 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:
101.1 pounds VOC per month and 0.62 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.2.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 Limitation:
Visible emissions shall not exceed 5% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-01(B)(1).
5. Emission Limitation:
Particulate emissions shall not exceed 0.551 pound per hour and 2.4 tons per year

Applicable Compliance Method:
If required, compliance with the hourly emission limit shall be determined through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limit may be established by multiplying the hourly emission limit by 8,760 hours of operation per year and dividing by 2,000 to convert to ton(s). Therefore, compliance with the annual emission limit shall be assumed if compliance with the hourly emission limit is maintained.
6. 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 emissions units R001, R002 and R003

Applicable Compliance Method:
Compliance shall be determined based on the record keeping specified in section C.3.

F. Miscellaneous Requirements

1. None

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Facility ID: 0285010310 Emissions Unit ID: R002 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>
paint booth no.2 with dry exhaust filters and multiple spray guns	OAC rule 3745-31-05(A)(3) (PTI # 02-18667)	less than 15 lbs VOC per day when coating metal furniture (see section A.2.a)
		maximum usage of 10 gallons coating per day for coating metal furniture and miscellaneous metal parts
		58.1 lbs VOC per day and 10.6 tons VOC per year when coating miscellaneous metal parts
		101.1 lbs VOC per month and 0.62 ton VOC per year from cleanup materials
		Visible emissions shall not exceed 5% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-21-09(I)(3)(a)	Particulate emissions shall not exceed 0.551 lb per hour and 2.4 tons per year
	OAC rule 3745-21-09(U)(1)(d)	Exempt. See section A.2.b.
	OAC rule 3745-17-07(A)(1)	Exempt. See section A.2.c.
	OAC rule 3745-17-11(B)(1)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart EE	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See section A.2.d.

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 at the facility.
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 requirement 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.
The emissions from emissions units R001, R002 and R003 shall not exceed:
 - i. 9.9 tons per year of any individual hazardous air pollutant (HAP); and
 - ii. 24.5 tons per year of total aggregate HAPs

B. Operational Restrictions

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, as appropriate:
 - 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 total VOC emissions, in pounds per day, from the coatings employed for coating miscellaneous metal parts as calculated by the following equation:

$$T = \text{the sum of the product of A times B for each coating applied,}$$

$$A = \text{mass of VOC per volume of coating (excluding water and exempt solvents), as applied, in units of pounds VOC per gallons,}$$

$$B = \text{volume of coating (excluding water and exempt solvents), as applied, in units of gallons per day; and}$$
 - d. the total VOC emissions, in pounds per day, from the coatings employed for coating metal furniture as calculated by the following equation:

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

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

B = volume of coating (excluding water and exempt solvents), as applied, in units of gallons per day.

2. The permittee shall collect and record the following information each month for this emissions unit, and all other coating lines at the facility, as appropriate:
 - 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, in pounds VOC per gallon,

Bc = volume of cleanup material employed, in gallons per month.
3. The permittee shall collect and record the following information each month for R001, R002, and 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 (3.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 (3.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 (3.b) times (3.d) for each coating and the sum of (3.f) times (3.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 (3.c) times (3.d) for each coating plus the sum of (3.g) times (3.h) for each cleanup material).
4. 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.
5. The permittee shall perform monthly 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.
6. 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., $G = (Bi)(Ci)(Di) + \dots (Bn)(Cn)(Dn) + (Ei)(Fi) + \dots (En)(Fn)$, 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., $I = (Bi)(Hi) + \dots (Bn)(Hn)$;
 - 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., $K = G/(I)(J)$.
7. 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 when coating miscellaneous metal parts exceeded 58.1 pounds per day; and
 - d. an identification of each month during which the calculated VOC emission rate from cleanup materials exceeded 101.1 pounds per month.
 2. 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 emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
 3. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
 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 miscellaneous metal parts and from use of cleanup materials during the calendar year. 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:
58.1 pounds VOC per day and 10.6 tons VOC per year when coating miscellaneous metal parts.

Applicable Compliance Method:
Compliance with the daily VOC limit shall be determined based on the record keeping specified in section C.1.c. Compliance with the annual VOC limit when coating 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:
101.1 pounds VOC per month and 0.62 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.2.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 Limitation:**
Visible emissions shall not exceed 5% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-01(B)(1).
5. **Emission Limitation:**
Particulate emissions shall not exceed 0.551 pound per hour and 2.4 tons per year

Applicable Compliance Method:
If required, compliance with the hourly emission limit shall be determined through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limit may be established by multiplying the hourly emission limit by 8,760 hours of operation per year and dividing by 2,000 to convert to ton(s). Therefore, compliance with the annual emission limit shall be assumed if compliance with the hourly emission limit is maintained.
6. **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 emissions units R001, R002 and R003.

Applicable Compliance Method:
Compliance shall be determined based on the record keeping specified in section C.3.

F. Miscellaneous Requirements

1. None

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Facility ID: 0285010310 Emissions Unit ID: R003 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>
one Binks coating booth with dimensions of 8 ft x 8 ft x 11.3 ft for 3 applications: 1) coating of circuit boards, 2) adhesive coating of metal furniture, and 3) adhesive coating of miscellaneous metal parts.	OAC rule 3745-31-05(A)(3) (PTI # 02-14412)	8 lbs VOC/hr, 40 lbs VOC/day on any day when coating only circuit boards
		less than 15 lbs VOC/day on any day when metal furniture is coated
		less than 10 gallons of coating per day on any day when coating miscellaneous metal parts
		Maximum allowable VOC emissions from coating booth is 17.3 tons/year (includes cleanup).
		The emission limits specified in this rule are equivalent to the emission limits established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See section A.2.c
	OAC rule 3745-21-09(I)(3)(a)	See section A.2.d
	OAC rule 3745-21-09(U)(2)(e)(iii)	Exempt. See section A.2.a.
	40 CFR 60, Subpart EE	Limits for visible particulate emissions are not
	OAC rule 3745-17-07	

OAC rule 3745-17-11

applicable. See section A.2.b.

Limits for particulates are not applicable. See section A.2.b.

2. Additional Terms and Conditions

- (a) 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 of metal furniture coatings (as applied) per year, during that 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.

No particulate emissions are generated from this coating booth due to the method of coating application.

OAC rule 3745-21-09(I)(3)(a) states that the requirement of OAC rule 3745-21-09(I)(1) shall not apply if all metal furniture coating lines, in combination, emit less than fifteen pounds of VOC per day.

OAC rule 3745-21-09(U)(2)(e)(iii) states that the requirement of OAC rule 3745-21-09(U)(1) shall not apply if less than 10 gallons per day of coating for coating miscellaneous metal parts are used.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. When coating the circuit boards, the permittee shall collect and record the following information for each day for the coating operation:

- a. The company identification for each coating and photochemically reactive cleanup material employed.
- b. The number of gallons of each coating and photochemically reactive cleanup material employed.
- c. For each day during which a photochemically reactive material is employed, the number of gallons of each coating and photochemically reactive cleanup material employed.
- d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
- e. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
- f. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non photochemically" are based upon OAC rule 3745-21-01(C)(5).]

2. 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:

- a. The name and identification number of each coating, as applied.
- b. The mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied.
- c. The total VOC emissions from the coatings employed, as calculated by the following equation:

$T = \text{The sum of the product of A times B for each coating applied}$

where:

$T = \text{Total VOC emissions from the combined coating lines before the application of capture systems and control devices, in units of pounds per day;}$

$A = \text{Mass of VOC per volume of coating (excluding water and exempt solvents), as applied, in units of pounds VOC per gallon; and}$

$B = \text{Volume of coating (excluding water and exempt solvents), as applied, in units of gallons per day.}$

3. The permittee shall collect and record the following information each day miscellaneous metal parts are coated:

- a. The name and identification number of each coating employed to miscellaneous metal parts.
- b. The volume, in gallons, of each coating employed to miscellaneous metal parts.
- c. The total volume, in gallons, of all of the coatings employed to miscellaneous metal parts.

4. The permittee shall collect and record the following information for clean-up materials at the facility:

- 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.
- d. The total VOC emissions from all cleanup materials employed, in pounds or tons.

5. The permittee shall maintain records of the total annual VOC emissions from all coating and cleanup materials employed, in tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the circuit boards are coated and the average hourly organic compound emissions from the coatings exceeded 8 pounds per hour, and the actual average organic compound emissions for each such day.
 - b. An identification of each day during which the circuit boards are coated and the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emission for each such day.
 - c. An identification of each day during which metal furniture is coated and the organic compound emissions from this emission unit and all other coating lines at the facility exceeded 15 pounds or greater per day.
 - d. An identification of each day during which miscellaneous metal parts are coated and the total amount of coating used is more than ten gallons per day.
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 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.
4. If the permittee uses more than 3,842 liters of metal furniture coatings (as applied) per year, the permittee shall notify the Director (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 Director (the Ohio EPA, Northeast District Office) within 45 calendar days after the exceedance occurs.
5. The permittee shall also submit annual reports of the total VOC emissions (including all cleanup) per calendar year. The reports shall be submitted by January 31 of each year for the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 8 lbs VOC/hr, 40 lbs VOC/day on any day when coating only the circuit boards.
Applicable Compliance Method: The record keeping requirements in section C.1 of this permit shall be used to determine compliance with the above limitations.
 - b. Emission Limitation: Less than 15 lbs VOC/day any day metal furniture is coated.
Applicable Compliance Method: The record keeping requirements in section C.2 of this permit shall be used to determine compliance with the above limitation.
 - c. Emission Limitation: Less than 10 gallons of coating per day on any day when coating miscellaneous metal parts.
Applicable Compliance Method: The record keeping requirements in section C.3 of this permit shall be used to determine compliance with the above limitation.
 - d. Emission Limitation: 17.3 tons VOC/year (includes cleanup)
Applicable Compliance Method: The record keeping requirements in section C.4 of this permit shall be used to determine compliance with the above limitation.

F. Miscellaneous Requirements

1. None