

Facility ID: 0285010336 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: 0285010336 Emissions Unit ID: K001 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>
Dip tank #1 followed by a natural gas oven, coating miscellaneous metal parts with coatings dried less than 200 degrees F.	OAC rule 3745-31-05(A)(3) (PTI 02-17222 Effective 1/25/2007)	See A.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1) (c) and OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(2)(c)	See A.2.a below.
	OAC rule 3745-35-07(B)	See A.2.c and A.2.d below.
	OAC rule 3745-17-11(C)	This emissions unit is exempt from the requirements in OAC rule 3745-17-11(C) according to OAC rule 3745-17-11(A)(h).

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content shall not exceed 3.5 pounds per gallon of coating, as applied, excluding water and exempt solvent. VOC emissions from all coatings, and additional solvents shall not exceed 28.0 pounds per hour. The short term emission limitation for VOC established above reflects the emissions unit's potential to emit using 8 gallons per hour maximum application rate and 3.5 pounds per gallon maximum VOC content; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation. VOC emissions shall not exceed 40.0 tons per rolling, 12-month period from this emissions unit. Emissions of each individual HAP shall not exceed 9.9 tons per rolling, 12-month period from all emissions units at this facility. Emissions of total, combined HAPs shall not exceed 24.9 tons per rolling, 12-month period from all emissions units at this facility. The permittee adds VOC materials to the dip tanks associated with this emissions unit under the following scenarios:
 - i. during the day, only compliant materials are added;
 - ii. during the day, both compliant and noncompliant materials (solvents) are added and the resulting mixture is compliant; or
 - iii. during the day, only noncompliant solvents or a noncompliant mixture of materials (solvents, and paints) are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under section C.1 of this permit.

B. Operational Restrictions

1. The annual coating usage for this emissions unit shall not exceed 20,000 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The annual additional solvent usage in this emissions unit shall not exceed 4,100 gallons per rolling, 12-month period, as applied, excluding water and exempt solvent. The permittee has existing production records such that there is no need for first year monthly usage limitations.
2. The permittee shall cover the dip tank in order to reduce VOC emissions when not actively in use.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day:
 - a. the name and identification number of each material added to the dip tanks;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tanks;
 - c. the number of gallons of each material added to the dip tanks, excluding water and exempt solvents;
 - d. on the days when a mixture of materials is added to the dip tanks, the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [calculated by summing (b x c) for all materials, divided by the total number of gallons, excluding water and exempt solvents, of all materials added to the system]; and
 - e. on the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tanks and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the VOC content of each tank containing solvent based coatings, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-add composite sample from each dip tank containing solvent based coatings in accordance with the procedures specified in Section E of this permit. The resulting VOC content shall be recorded.
 2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the total gallons of coatings added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit;
 - b. the total gallons of additional solvent added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit;
 - c. the total gallons of coatings added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit, as a rolling, 12-month summation; and
 - d. the total gallons of additional solvent added to the tanks, excluding water and exempt solvent, while in operation in this emissions unit, as a rolling, 12-month summation.
 3. The permittee shall collect and record the following information each month for all HAP emitting emissions units at this facility:
 - a. the name and identification number of each coating, additional solvent and cleanup material;
 - b. the individual Hazardous Air Pollutant (HAP) content each coating, additional solvent and cleanup material in pounds of individual HAP per gallon of coating;
 - c. the total combined Hazardous Air Pollutant (HAP) content of each coating in pounds of combined HAPs per gallon of each coating, additional solvent and cleanup material, i.e., sum all the individual HAP contents from (b) for each coating, additional solvent and cleanup material;
 - d. the number of gallons of each coating, additional solvent and cleanup material employed;
 - e. the total individual HAP emissions from all coatings, additional solvents and cleanup materials employed, in tons per month and tons per rolling 12-month period, i.e., for each HAP, the sum of (b) times (d) for each coating, additional solvent and cleanup material divided by 2000; and
 - f. the total combined Hazardous Air Pollutant (HAP) emissions from all coatings, additional solvents and cleanup materials employed, in tons per month and tons per rolling, 12-month period, i.e., the sum of (c) times (d) for each coating for each coating, additional solvent and cleanup material divided by 2000.

A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. 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.
 4. Each month the permittee shall record:
 - a. the total VOC emissions from this emissions unit, i.e., the sum of C.1.b times C.1.c for each day during month and each coating, divided by 2000; and
 - b. the total VOC emissions for the previous rolling, 12-month period.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the Ohio EPA, Northeast District Office) in writing of any daily record showing an exceedance of the VOC content limitation of 3.5 lbs VOC/gallon of coating as applied, excluding water and exempt solvents. 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 quarterly deviation (excursion) reports that identify any deviations of the following:
 - a. 9.9 tons of individual HAP emissions from all the emissions units at this facility, in tons per rolling, 12-month period;
 - b. 24.9 tons of combined HAP emissions from all the emissions units at this facility, in tons per rolling, 12-month period; and
 - c. the maximum allowable cumulative coating and additional solvent usage limitations for this emissions unit.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall submit annual reports which identify :
- the total gallons of coating and the total gallons of additional solvent employed in this emissions unit, excluding water and exempt solvent;the total gallons of coating and the total gallons of additional solvent employed in this emissions unit, excluding water and exempt solvent;
 - the total VOC emissions from this emissions unit, in tons per year;
 - the total individual HAP emissions emitted at this facility; and
 - the total combined HAPs emissions emitted at this facility.

These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31 of each year and shall include a statement of the corresponding emissions limitations in 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:
Emission Limitation:
VOC content shall not exceed 3.5 lbs per gallon of coating, excluding water and exempt solvents, as applied and 3.5 lbs per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvent (on the days when solvents are added to the dip tanks).

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 of the terms and conditions of this permit.

The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

Daily volume-weighted average = [summation of (Gi X VOCi)] / [summation of Gi] for i = 1 to n

where:

i = 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that day;

Gi = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day; and

VOCi = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents .

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. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

Emission Limitation:

VOC emissions shall not exceed 28.0 pounds per hour.

Applicable Compliance Method:

The short term emission limitation for VOC established above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

Emission Limitation:

VOC emissions shall not exceed 40.0 tons per rolling, 12-month period.

Applicable Compliance Method:

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

Emission Limitation:

Each individual HAP emissions shall not exceed 9.9 tons, based upon a rolling, 12-month summation for all emissions units at this facility.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.3.

Emission Limitation:

Total, combined HAP shall not exceed 24.9 tons, based upon a rolling, 12-month summation for all emissions units at this facility.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.3.

F. Miscellaneous Requirements

1. None