

Facility ID: 0285030313 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.

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

Facility ID: 0285030313 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>
Twin conveyORIZED roll coaters with 2 ovens, and a common PTE and thermal incinerator	OAC 3745-21-07 (G)(2)	85 % overall VOC control efficiency 90% VOC destruction efficiency
	OAC 3745-31-05 PTI # 02-0606	1.32 lbs VOC per hour and 5.77 tons VOC per year
		1.25 lbs any single HAP per hour and 5.49 tons any single HAP per year
		1.32 lbs combined HAPs per hour and 5.77 tons combined HAPs per year

2. Additional Terms and Conditions

- (a) The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.
The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened.) Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1500 degrees F.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating, solvent, and cleanup material employed;
 - b. the number of gallons of each coating, solvent, and cleanup material employed;
 - c. the VOC and single HAP content of each coating, solvent, and cleanup material, in pounds per gallon;
 - d. the uncontrolled VOC and single HAP emission rate for each coating, solvent, and cleanup material, in pounds per day;
 - e. the total controlled VOC and single HAP emission rate for all coatings, solvents, and cleanup materials, in pounds per day (i.e., the sum of the values from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled VOC and single HAP emission rate for all coatings, solvents, and cleanup materials; i.e., (e) / (f), in pounds per hour (average).

These daily records, as well as any supporting coatings/solvent mixture analyses and computations, shall be retained on site in the company files for a period of not less than five (5) years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1500 degrees F.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly controlled VOC and single HAP emission rate (from coatings, solvents, and cleanup materials) exceeded 1.32 and 1.25 pounds per hour, respectively, and the actual average hourly controlled emission rates for each such day. Such report shall be sent to the Northeast District Office of the Ohio Environmental Protection Agency and be received by the 15th day following the end of the calendar quarter.
2. The permittee shall also submit an annual report to the Northeast District Office of the Ohio Environmental Protection Agency by February 15 of each year which summarizes the following pertinent information for the previous calendar year:
 - a. the cumulative hours of operations for this roll coater;
 - b. the company identification of each coating, solvent, and cleanup material used in this emissions unit;
 - c. the volume/weight of each coating, solvent, and cleanup material used in this emissions unit;
 - d. the relative percentage of VOCs and HAPs in each coating, solvent, and cleanup material used in this emissions unit; and
 - e. the total annual VOC and HAPs (individual and combined) emissions for this emissions unit.
3. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. This report shall be submitted to the Northeast District Office of the Ohio Environmental Protection Agency by the 15th day following the end of the calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
85 % overall control
1.32 lbs VOC per hour and 5.77 tons VOC per year
1.25 lbs any single HAP per hour and 5.49 tons any single HAP per year
1.32 lbs all HAPs per hour and 5.77 tons all HAPs per year

Applicable Compliance Method:
OAC rule 3745-21-10(B), if requested. USEPA Methods 24 and 24A or formulation data shall be used to determine the VOC and HAP contents. Compliance shall be determined based upon record keeping above.

F. Miscellaneous Requirements

1. None