



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/2/2012

Kim Hall
Pacific Manufacturing Ohio, Inc.
8955 Seward Road
Fairfield, OH 45011

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409030976
Permit Number: P0109887
Permit Type: Renewal
County: Butler

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
SWOQA; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Pacific Manufacturing is an existing automotive parts manufacturer located in Butler County, Ohio. Federally-enforceable Permit to Install and Operate (FEPTIO) P0109887 is a renewal PTIO for emissions unit K001, a continuous conveyor coating line for plastic automotive parts (engine covers) that includes a de-static booth, enclosed spray coating booth, flash-off tunnel, drying oven and a recuperative thermal oxidizer. The active operating permit for this source expires on 5/14/2012. K001 was installed in 2006 under Permit to Install (PTI) 14-05786, issued 1/5/2006. The drying oven has a natural-gas fired burner rated at 1 mmBtu/hr. The thermal oxidizer has a 2 mmBtu/hr natural-gas fired burner unit. All volatile organic compound (VOC) emissions from the coating line, including the spray booth enclosure, flash off tunnel, and drying oven vent to the thermal oxidizer. Cleanup occurs within the spray booth enclosure.

3. Facility Emissions and Attainment Status:

Butler County is currently attainment for all other criteria pollutants. Regulated emissions from the facility consist of VOCs and hazardous air pollutants (HAP) from coating operations in emissions unit K001 and in emissions unit K002 (an electrodeposition coating line). Potential facility-wide HAP emissions are less than 1 ton per year (TPY). Potential facility-wide VOC emissions upon issuance of this permit renewal are as follows:

Emissions unit K001	9.0 TPY VOC pursuant to FEPTIO P0109887 (renewal)
Emissions unit K002	<u>7.6 TPY</u> VOC pursuant to PTIO P0109016, issued 12/6/11
Facility-wide Total	16.6 TPY VOC

Actual emissions from emissions unit K001 in 2011 were 0.09 TPY of VOC. A performance test was conducted on 11/18/2011 and demonstrated 99.3% overall control efficiency for the thermal oxidizer on K001.

4. Source Emissions:

Emissions unit K001 is a plastic parts coating line that includes a de-static booth, enclosed spray coating booth, flash-off tunnel, drying oven and a recuperative thermal oxidizer. All emissions from the coating line are captured and vented to the thermal oxidizer. The permittee currently employs two types of coatings (silver and gray) on the line. Emissions from the source include VOCs and HAPs from the coatings and cleanup materials and nitrogen oxides (NOx), carbon monoxide (CO), and VOC from the combustion of natural gas in the drying oven and oxidizer. Particulate emissions (overspray) are controlled by multiple fabric filters in the spray booth enclosure.



Emissions unit K001 was installed in March of 2006 and is subject to best available technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) as established in PTI 14-05786 which include limits on the coating and cleanup VOC content, material usage, and an overall control efficiency requirement of 95%. At the time of the initial PTI, K001 was also subject to the requirements of the SIP-approved OAC rule 3745-21-07(G) which required a minimum of 85% overall control efficiency and assured that the source was not major for VOCs. OAC rule 3745-21-07(G) has since been rescinded; however, the permittee is still subject to the existing BAT control efficiency requirements to maintain potential emissions below major source levels. The permittee has requested that the existing control efficiency requirements under BAT be made federally enforceable upon renewal; therefore, this permit action is recommended for draft issuance and will specify the control efficiency requirements as federally enforceable under OAC rule 3745-31-05(C). In addition, this permit action retains quarterly deviation reporting for the federally-enforceable control efficiency and monitoring requirements. Without capture and control, the uncontrolled potential VOC emissions from the coating line are approximately 180 TPY. Since the allowable VOC emission rates and annual coating usage rates in this permit action are based upon the maximum potential coating application rate of the coating line at 6.7 gallons per hour and the federally enforceable 95 percent control efficiency requirement, 12-month rolling production or operation limitations are not required for the purpose of federal enforceability.

Allowable emissions and operating restrictions established in this FEPTIO action for this source are as follows and represent BAT as established in the original PTI:

FEPTIO P0109887, Emissions Unit K001 Permit Renewal

48.24 lbs/day VOC, from coatings employed, excluding cleanup

8.99 TPY VOC, from coatings and cleanup combined

1.21 lbs/hr and 5.3 TPY of NO_x from natural gas combustion in the drying oven and oxidizer

1.63 lbs/hr and 7.14 TPY of CO from natural gas combustion in the drying oven and oxidizer

0.015 lb/hr and 0.07 TPY of VOC from natural gas combustion in the drying oven and oxidizer

95% overall VOC reduction and 95% control efficiency of thermal oxidizer

6.0 lbs VOC/gallon of coating, as applied

7.7 lbs VOC/gallon of cleanup material

950 gallons per year of cleanup material

58,692 gallons per year of coating (equals maximum potential)

The NO_x and CO limitations represent the potential to emit (PTE) and are based upon emission factors provided by the oven and oxidizer manufacturers in the initial PTI application. The VOC limitation for the drying oven and oxidizer represents the PTE and is based upon natural gas combustion factors found in AP-42, Section 1.4. PE and SO₂ emissions from gas combustion are insignificant and were not included in the BAT determination under the initial PTI; therefore, they have not been included in this permit renewal.

According to the manufacturer's coating information provided by the permittee in the FEPTIO application, the coating formulations currently in use contain toluene and other constituents potentially subject to the Ohio Air Toxics Policy under OAC 114-01. However, potential emissions do not exceed 1 TPY for any of the constituents; therefore, the Air Toxics Policy does not apply.

The spray coating application is subject to OAC rule 3745-17-11(C) for particulate control and the spray booth enclosure is a recirculating air unit that is equipped with multiple banks of fabric filters. The area source MACT rule 40 CFR Part 63 Subpart HHHHHH for surface coating operations does not apply since the emissions unit K001 does not employ coatings that contain the target HAPs specified in this rule.



Actual emissions from emissions unit K001 in 2011 were 0.09 TPY of VOC. A performance test was conducted on 11/18/2011 and demonstrated 99.3% overall control efficiency for the thermal oxidizer on K001. Total coating usage in 2011 was 5,317 gallons and cleanup material usage was 311 gallons. The reported worst case actual coating VOC content, as applied, was 4.59 pounds VOC/gallon. The reported actual cleanup material is 4.01 pounds VOC/gallon.

5. Conclusion:

This FEPTIO includes emission limitations, operational restrictions, monitoring requirements, record keeping requirements, reporting, and testing requirements sufficient to demonstrate compliance with OAC rules and the federally-enforceable control efficiency requirements. Compliance with the federally enforceable control efficiency requirement will ensure that the facility maintains its status as a minor source. Actual emissions and material usage are less than the allowable limitations. Issuance of a draft FEPTIO for this renewal is recommended.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.06
NOx	5.3
CO	7.14

PUBLIC NOTICE

5/2/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Pacific Manufacturing Ohio, Inc.

8955 Seward Road,

Fairfield, OH 45011

Butler County

FACILITY DESC.: All Other Motor Vehicle Parts Manufacturing

PERMIT #: P0109887

PERMIT TYPE: Renewal

PERMIT DESC: Permit to Install and Operate Renewal for Plastic Parts Coating Lines; Establishes Control Efficiency as Federally Enforceable to Avoid Title V

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Paul Tedtman, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Pacific Manufacturing Ohio, Inc.**

Facility ID:	1409030976
Permit Number:	P0109887
Permit Type:	Renewal
Issued:	5/2/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Pacific Manufacturing Ohio, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. K001, Engine Cover Paint Line 1 11

Authorization

Facility ID: 1409030976

Application Number(s): A0044294

Permit Number: P0109887

Permit Description: Permit to Install and Operate Renewal for Plastic Parts Coating Lines; Establishes Control Efficiency as Federally Enforceable to Avoid Title V

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 5/2/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Pacific Manufacturing Ohio, Inc.
8955 Seward Road
Fairfield, OH 45011

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109887

Permit Description: Permit to Install and Operate Renewal for Plastic Parts Coating Lines; Establishes Control Efficiency as Federally Enforceable to Avoid Title V

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Engine Cover Paint Line 1
Superseded Permit Number:	14-05786
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. K001, Engine Cover Paint Line 1

Operations, Property and/or Equipment Description:

Paint line comprised of a de-static booth, enclosed recirculating air spray booth, flash off tunnel, gas-fired drying oven, and recuperative thermal oxidizer (coating plastic parts)

a) 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. g)(1).

(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. b)(1)b., b)(2)a., c)(5), d)(1), d)(2), e)(2), f)(1)d., and f)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>Best Available Technology Determination for Source Installed Prior to August 3, 2006.</i>	Volatile organic compound (VOC) emissions shall not exceed 48.24 pounds per day from the coatings employed in this emissions unit, excluding cleanup material.* VOC emissions shall not exceed 8.99 tons per year (TPY) from the coatings and cleanup material employed in this emissions unit. Emissions from the combustion of natural gas in the drying oven and recuperative thermal oxidizer serving this emissions unit shall not exceed the following: Nitrogen oxides (NOx) emissions shall not exceed 1.21 pounds per hour and 5.3



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>TPY;*</p> <p>Carbon monoxide (CO) emissions shall not exceed 1.63 pounds per hour and 7.14 TPY;* and,</p> <p>VOC emissions shall not exceed 0.015 pound VOC per hour and 0.07 TPY.*</p> <p>*The emission limitations outlined above are based on the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limitations.</p> <p>See c)(1), c)(2), c)(3), and c)(4).</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	<p>OAC rule 3745-31-05(D)</p> <p><i>Federally Enforceable Limitations to Avoid Title V Applicability</i></p>	<p>See b)(2)a., c)(5), d)(1), d)(2), e)(2), f)(1)d., and f)(2).</p>
c.	<p>OAC rule 3745-17-11(C)</p>	<p>See c)(6) and d(4) – d)(7).</p>

(2) Additional Terms and Conditions

- a. The capture and control system shall provide not less than an 95 percent reduction, by weight, in the overall VOC emissions from the paint line and the control efficiency of the thermal oxidizer shall not be less than 95 percent, by weight, for the VOC emissions vented to it.
- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, material usage restrictions, VOC content limitations, and the use of a thermal oxidizer having an overall VOC control efficiency of at least 95 percent.

c) Operational Restrictions

- (1) The maximum VOC content of the coating employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied, excluding water and exempt solvents.
- (2) The maximum VOC content of the cleanup material employed in this emissions unit shall not exceed 7.7 pounds of VOC per gallon.

- (3) The maximum annual coating usage for this emissions unit shall not exceed 58,692 gallons. This limitation represents the emissions unit's potential based upon the maximum spray application rate of 6.7 gallons per hour at 8,760 operating hours per year.
 - (4) The maximum annual cleanup material usage for this emissions unit shall not exceed 950 gallons.
 - (5) The thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instruction, and operating manuals.
 - (6) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
 - (2) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:
 - a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

- (3) The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
- the name and identification number of each coating, as applied;
 - the VOC content of each coating, as applied, excluding water and exempt solvents, in pounds per gallon;
 - the number of gallons of each coating employed;
 - the name and identification of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds per gallon;
 - the number of gallons of each cleanup material employed;
 - the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons, i.e., the summation of the products of "b" x "c" and "e" x "f";
 - the overall fractional control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
 - the calculated controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons, i.e., "g" x (1 - "h").
- (4) 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. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) 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 and it shall be made available to the Ohio EPA upon request.
- 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.
- (6) 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 and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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.

e) **Reporting Requirements**

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the overall VOC capture and control efficiency shall be at least 95 percent, by weight;
 - ii. the control efficiency of the thermal oxidizer shall not be less than 95 percent, by weight, for the VOC emissions vented to it;
 - iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
 - iv. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC emissions shall not exceed 48.24 pounds per day from the coatings employed in this emissions unit, excluding cleanup material.

Applicable Compliance Method:

The emission limitation above is based upon the emissions unit's potential to emit and was based upon the maximum hourly production and material usage rate of 6.7 gallons of coating per hour as provided by the permittee in the permit application No. A0044294, submitted 4/10/2012, for this emissions unit and the following equation:

6.7 gallons coating/hour x maximum 6.0 pounds VOC/gallon of coating x 24 hours/day x (1 – 0.95, overall fractional control efficiency requirement) = 48.24 pounds of VOC per day.

b. Emission Limitation:

VOC emissions shall not exceed 8.99 TPY from the coatings and cleanup material employed in this emissions unit.

Applicable Compliance Method:

The emission limitation above is based upon the maximum hourly production and material usage rates as provided by the permittee in the permit application No. A0044294, submitted 4/10/2012, for this emissions unit and the following equation:

$$[(6.7 \text{ gallons coating/hour} \times \text{maximum } 6.0 \text{ pounds VOC/gallon of coating} \times 8760 \text{ hours/year}) + (\text{maximum } 7.7 \text{ pounds VOC/gallon of cleanup material} \times 950 \text{ gallons of cleanup material/year})] \times (1 - 0.95, \text{ overall fractional control efficiency requirement}) \times (1 \text{ ton}/2000 \text{ pounds}) = 8.99 \text{ TPY of VOC.}$$

Compliance with the annual VOC emission limitation shall be demonstrated by compliance with the operational restrictions in c), the record keeping requirements listed in d)(3), and the emissions testing conducted as required in f)(2) of this permit.

U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for each coating material. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

c. Emission Limitations:

Emissions from the combustion of natural gas in the drying oven and recuperative thermal oxidizer serving this emissions unit shall not exceed the following:

NOx emissions shall not exceed 1.21 pounds per hour and 5.3 TPY;

CO emissions shall not exceed 1.63 pounds per hour and 7.14 TPY; and,

VOC emissions shall not exceed 0.015 pound VOC per hour and 0.07 TPY.

Applicable Compliance Method:

The pound per hour and annual emission limitations above are based upon the emissions unit's potential to emit, operating 8,760 hours per year.

The NO_x and CO pound per hour emission limitations are the manufacturer's guaranteed oxidizer emission rate and oven design specification for natural gas combustion as provided by the permittee in the initial application for Permit to Install (PTI) 14-05786, dated November 7, 2005. Compliance with the annual emission limitations shall be determined by multiplying the pound per hour emission rate by 8760 hours per year and dividing by 2000 lbs/ton.

The VOC pound per hour emission limitation is based upon US EPA AP-42 emission factors for natural gas combustion as found in Section 1.4, Table 1.4-2, dated July, 1998. Compliance with the annual emission limitation shall be determined by multiplying the pound per hour emission rate by 8760 hours per year and dividing by 2000 lbs/ton.

d. Emission Limitation:

The capture and control system shall provide not less than an 95 percent reduction, by weight, in the overall VOC emissions from the paint line and the control efficiency of the thermal oxidizer shall not be less than 95 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance with the emission limitation above shall be based upon on the results of emission testing conducted to determine overall control efficiency as specified in f)(2) of this permit.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within six months of expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation (95%) for VOC emissions.
 - c. The following test methods shall be employed to demonstrate compliance with the overall control efficiency:
 - i. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - ii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in

accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) Miscellaneous Requirements
- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), 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 per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO 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 PTIO.