

Facility ID: 0320010026 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.

[Go to Part II for Emissions Unit K001](#)

[Go to Part II for Emissions Unit K002](#)

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Facility ID: 0320010026 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>
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2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. None

D. Reporting Requirements

1. None

E. Testing Requirements

1. None

F. Miscellaneous Requirements

1. None

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Facility ID: 0320010026 Emissions Unit ID: K002 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 Spray Booth w/ Filters	PTI # 03-8408	64.44 lbs VOC/day (monthly average)
		3.22 tons VOC based upon rolling 12-month summation of the monthly emissions, including coatings and cleanup materials
	OAC 3745-21-09 (U)(1)(d)	3.5 lbs VOC/gal. coating, minus water and exempt solvents, for each coating
	OAC 3745-17-11(B)	0.551 lb particulate matter/hr
	OAC 3745-17-07(A)(1-3)	20% opacity, except as provided by rule

2. **Additional Terms and Conditions**

- (a) None

B. **Operational Restrictions**

1. This permit allows for the use of the coatings and cleanup materials as specified by the permittee in its PTI application number 03-8408. In conjunction with the requirements of OAC 3745-31-05, the emission limits specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Division of Air Pollution Control, Northwest District Office (NWDO) are required:
 - Any change in the composition of the new coatings or cleanup materials or use of new coatings or cleanup materials that would result in the emissions of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the book entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than is currently reflected in the permittee's PTI application.
 - Any change to the emissions unit or its exhaust parameters that would result in an exceedance of the Maximum Acceptable Ground-Level Concentration (MAGLC) of any air toxic beyond plant property lines.
 - Any change in the composition of the coatings or cleanup materials or use of new coatings or cleanup materials that would result in the emissions of any organic compound excluded from the definition of "VOC" in OAC rule 3745-21-01(B)(6).
 - Any change in the composition of the coatings or cleanup materials or use of new coatings or cleanup materials that would result in an increase in emission of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01(V).
 - Any change to the emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01(KK).

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each month for the line:
 - (a) The name and identification number of each coating, as applied.
 - (b) The VOC content of each coating (excluding water and exempt solvents), as applied.
 - (c) The number of gallons (excluding water and exempt solvents) of each coating employed.
 - (d) The total amount of VOC emitted from all coatings employed, in pounds or tons per month.
 - (e) The name and identification of each cleanup material employed.
 - (f) The VOC content of each cleanup material, in pounds per gallon.
 - (g) The number of gallons of each cleanup material employed.
 - (h) The amount of VOC emitted from all cleanup materials employed, in pounds or tons per month.
 - (i) The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month.
 - (j) The rolling 12-month VOC emissions, in tons per year, calculated by summing the emissions for the current month with the emissions from the previous 11 calendar months.

D. **Reporting Requirements**

1. The permittee shall notify the Director of any monthly record showing the use of noncomplying coatings. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which identify any exceedances of the rolling 12-month summation of 3.22 tons VOC, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance Methods Requirements:

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):

Emission Limitation:

3.5 lbs VOC/gallon coating, minus water and exempt solvents

Applicable Compliance Method:

Any determination of VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

Emission Limitation:

64.44 lbs VOC/day (monthly average)

Applicable Compliance Method:

The total monthly VOC emissions from coatings and cleanup materials usage (lbs/month) shall be divided by the number of days of operation in that month, where the days of operation equals the number of days when coating materials were employed.

Emission Limitation:

0.551 lb particulate matter/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for particulate matter, the following equation shall be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

E = Particulate matter emissions rate (lbs/hr)

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control efficiency of the control equipment

Emission Limitation:

20% opacity

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

3.22 tons VOC based upon rolling 12-month summation of the monthly emissions

Applicable Compliance Method:

Recordkeeping of monthly VOC emissions from coatings and cleanup materials usage shall be used to calculate the rolling 12-month emissions by summing the emissions for the current month with the emissions from the previous 11 calendar months.

F. **Miscellaneous Requirements**

1. None