

Facility ID: 0332000204 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: 0332000204 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>
paint spray booth, miscellaneous metal parts with primary and secondary filters	PTI #03-9897	36.59 lbs volatile organic compounds (VOC)/day (including VOC emissions from cleanup); 6.67 tons VOC/year (including VOC emissions from cleanup)
		0.10 lb particulate emissions (PE)/hour; 0.44 ton PE/year
	3745-21-09 (U)(2)(e)(ii)	best available technology (see A.2.2.a) exemption based on maximum usage not to exceed 10 gallons of coatings each day
	3745-17-07	20 percent opacity, except as provided by rule
	3745-17-11	*

2. Additional Terms and Conditions

- (a) Exhaust gases from the spray booth shall be vented through properly operated and maintained primary and secondary filters.

* The limit based on this rule is less stringent than the PTI's limit above.

B. Operational Restrictions

1. This permit allows for the use of the coating and cleanup materials specified by the permittee in PTI application number 03-9897. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene emission limitation specified in this permit was established in accordance with Ohio EPA's "Air Toxics Policy" and is based on both the coating and cleaning solvent formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for the pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground level concentration to the maximum allowable ground level concentration ("MAGLC"). The following table summarizes the results of the modeling for the pollutant:

Pollutant: Toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (ug/m3): 3.60

Predicted 1 Hour Maximum Ground Level Concentration at Fenceline (ug/m3): 180.5

Maximum Acceptable Ground Level Concentration (MAGLC) (ug/m3): 4260

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 03-9897 and the operating permit:

1. Any change in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup

materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the TLV value specified in the above table.

Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an increase in the MAGLC specified in the above table.

A reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the MAGLC.

Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [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 emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01(V).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
the name and identification of each coating employed;
the VOC content of each coating, as applied, in pounds per gallon;
the volume, in gallons, of each coating employed; and
the total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each day for this emissions unit:
the name and identification of each cleanup material employed;
the number of gallons of each cleanup material employed;
the VOC content of each cleanup material, in pounds per gallon; and
the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director of any daily record showing that the company employed more than the maximum daily coating usage limit of 10 gallons of VOC. A copy of such record shall be sent to the Director within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the total amount of VOC emissions, in tons per year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly reports which identify any exceedances of the daily allowable mass emission limitations of 36.59 pounds VOC, as well as the corrective actions that were taken to achieve compliance.

E. Testing Requirements

1. Compliance Methods Requirements:

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation-
36.59 lbs VOC/day
6.67 tons VOC/year

Applicable Compliance Method-

Recordkeeping requirements shall be used to demonstrate compliance with the above emissions limits.

Any determination of the 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 permittee shall determine the composition of the coating/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup materials or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the 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, excluding water and exempt solvents.

Emission Limitation:
20% opacity

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)
Emission Limitation:
0.1 lb PE/hr

Applicable Compliance Method:

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

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

$E = \text{particulate emissions rate (lbs/hr)}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used}$

$CE = \text{fractional control efficiency of the control equipment}$

Emission Limitation:

0.44 ton PE/year

Applicable Compliance Method:

To determine the actual worst case annual particulate emissions, the following equation shall be used:

$E_a = \text{maximum coating solids usage rate in tons per year} \times (1-TE) \times (1-CE)$

E_a = particulate emissions (tons/year)

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 = fractional control efficiency of the control equipment

F. **Miscellaneous Requirements**

1. None