

Facility ID: 0332010051 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.

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

Facility ID: 0332010051 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>
miscellaneous metal parts spray booth with dry filtration (north booth)	OAC rule 3745-31-05(A)(3) (PTI #03-17075 issued 01/24/06 and issued corrected copy 02/07/06)	Coating Emissions: 53.80 lbs of organic compounds (OC)/day; 9.82 tons of OC/year Cleanup Emissions: 267.60 lbs of OC/month; 1.61 tons of OC/year See A.2.a
	OAC rule 3745-21-09(U)(2)(e)(iii)	volatile organic compound (VOC) emission exemption, based on maximum coating usage never exceeding 10 gallons in any one day

2. **Additional Terms and Conditions**
 - (a) The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(2)(e)(iii).

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for coating operations in emissions unit K001:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all coatings employed;
 - d. the organic compound (OC) content of each coating, in lbs/gallon, as applied;
 - e. the OC emission rate for each coating, in lbs/day (b x d); and
 - f. the total OC emission rate for all coatings, in lbs/day (sum of e).
2. The permittee shall collect and maintain monthly records of the following information for the cleanup operations in emissions unit K001:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of cleanup material employed;
 - c. the OC content of each cleanup material employed, in lbs/gallon;

- d. the OC emission rate for cleanup material (b x c), in lbs/month; and
- e. the total monthly OC emission rate for all cleanup materials employed, in tons (sum of d).
3. The Permit to Install for emissions units K001 and K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Methyl Ethyl Ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 2.24
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 389
 MAGLC (ug/m3): 14,042
4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 lowest TLV previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing Permit to Install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final Permit to Install prior to the change.
- The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports which identify any exceedances of the 53.80 lbs of OC/day from the use of coatings.
2. The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
3. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports which identify any exceedances of the 267.60 lbs of OC/month from the use of cleanup materials.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
- Emission Limitation:
- 53.80 lbs of organic compounds (OC)/day from coating operations
- Applicable Compliance Method:
- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
- Emission Limitation:
- 9.82 tons of OC/year from coating operations
- Applicable Compliance Method:
- The annual emission limitation was established by multiplying the daily OC emission limitation by the maximum

operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation will be assumed.

Emission Limitation:

267.60 lbs of OC/month

Applicable Compliance Method:

Compliance with the monthly limitation shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2 of this permit.

Emission Limitation:

1.61 tons of OC/year from cleanup operations

Applicable Compliance Method:

The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is shown with the monthly OC limitation, compliance with the annual limitation will be assumed.

Emission Limitation:

VOC emission exemption, based on maximum usage of coating never exceeding 10 gallons in any one day

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 0332010051 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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- 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>
miscellaneous metal parts spray booth with dry filtration (south booth)	OAC rule 3745-31-05(A)(3) (PTI #03-17075 issued 01/24/06 and issued corrected copy 02/07/06)	Coating Emissions: 53.80 lbs of organic compounds (OC)/day; 9.82 tons of OC/year Cleanup Emissions: 267.60 lbs of OC/month; 1.61 tons of OC/year See A.2.a
	OAC rule 3745-21-09(U)(2)(e)(iii)	volatile organic compound (VOC) emission exemption, based on maximum coating usage never exceeding 10 gallons in any one day

2. Additional Terms and Conditions

- (a) The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(2)(e)(iii).

B. Operational Restrictions

1. None
- C. **Monitoring and/or Record Keeping Requirements**
 1. The permittee shall collect and record the following information each day for coating operations in emissions unit K002:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all coatings employed;
 - d. the organic compound (OC) content of each coating, in lbs/gallon, as applied;
 - e. the OC emission rate for each coating, in lbs/day (b x d); and
 - f. the total OC emission rate for all coatings, in lbs/day (sum of e).
 2. The permittee shall collect and maintain monthly records of the following information for the cleanup operations in emissions unit K002:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of cleanup material employed;
 - c. the OC content of each cleanup material employed, in lbs/gallon;
 - d. the OC emission rate for cleanup material (b x c), in lbs/month; and
 - e. the total monthly OC emission rate for all cleanup materials employed, in tons (sum of d).
 3. The Permit to Install for emissions units K001 and K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 2.24
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 389
 MAGLC (ug/m3): 14,042
 4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 lowest TLV previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing Permit to Install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. **Reporting Requirements**
 1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports which identify any exceedances of the 53.80 lbs of OC/day from the use of coatings.

2. The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
3. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports which identify any exceedances of the 267.60 lbs of OC/month from the use of cleanup materials.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
Emission Limitation:

53.80 lbs of organic compounds (OC)/day from coating operations

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
Emission Limitation:

9.82 tons of OC/year from coating operations

Applicable Compliance Method:

The annual emission limitation was established by multiplying the daily OC emission limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation will be assumed.
Emission Limitation:

267.60 lbs of OC/month

Applicable Compliance Method:

Compliance with the monthly limitation shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2 of this permit.
Emission Limitation:

1.61 tons of OC/year from cleanup operations

Applicable Compliance Method:

The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is shown with the monthly OC limitation, compliance with the annual limitation will be assumed.
Emission Limitation:

VOC emission exemption, based on maximum usage of coating never exceeding 10 gallons in any one day

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

F. Miscellaneous Requirements

1. None