

Facility ID: 0332010063 Issuance type: Title V Draft Permit

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 III" and before "I. 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: 0332010063 Issuance type: Title V Draft Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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

Facility ID: 0332010063 Issuance type: Title V Draft Permit

b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility: B001, B002, B003, B004, P001, P002, P003, P004, P005, L001, Z001, Z002, and Z003. Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

[Go to Part III for Emissions Unit K003](#)

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

Facility ID: 0332010063 Issuance type: Title V Draft Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 0332010063 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
Coating line with thermal incineration: The line consists of 3 flow coaters, 2 natural gas-fired ovens, 1 radio frequency oven and 3 thermal incinerators.	see section A.VI	see A.I.2.2.a
	3745-21-09 (B)(6) in lieu of 3745-21-09 (U)(1)(c)	see A.I.2.2.a

2. Additional Terms and Conditions

- a. In lieu of complying with the limitation of 6.7 pounds of VOC per gallon of solids (lbs/gallon) in OAC 3745-21-09 (U)(1)(c), the permittee shall comply with the provisions of OAC 3745-21-09 (B)(6). This requires the permittee to demonstrate that the capture and control equipment provide not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. 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 1375 degrees Fahrenheit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the combustion chamber of the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. 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 operating manuals.
2. The permittee shall collect and record the following information each day for the control equipment:
 - a. a log of the operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all three-hour periods of operation during which the average combustion temperature was below 1375 degrees Fahrenheit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit to the Director quarterly summaries of all records required by section A.III.2. These reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

1. 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 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation (81% by weight) and the control (destruction) efficiency limitation (90% by weight) for VOC.
 - c. The following test methods shall be employed to demonstrate compliance with the overall reduction and control (destruction) efficiency requirements: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix 204.
 - d. Compliance with the overall reduction and control efficiency requirements shall be demonstrated based upon results of the capture efficiency and control efficiency tests required above. 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.) 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 OAC rule 3745-21-10. 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.
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
2. 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).

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.

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).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. Miscellaneous Requirements

1. The following terms and conditions and those listed in section B.VI shall supersede the air pollution control requirements contained in the permit to install (application number 03-9766) issued for this emissions unit on October 9, 1996: A.I., A.III. and A.IV.

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

Facility ID: 0332010063 Issuance type: Title V Draft Permit

[Go to the top of this document](#)

Facility ID: 0332010063 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
Coating line with thermal incineration: The line consists of 3 flow coaters, 2 natural gas-fired ovens, 1 radio frequency oven and 3 thermal incinerators.	see section B.VI.	see B.I.2.2.b.

2. Additional Terms and Conditions

- a. This emissions unit shall not employ any solvent-based cleanup material.
- b. The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 11.1 lbs/hr and 48.62 tons/year.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. This permit allows for the use of the coating materials specified by the permittee in the application for PTI number 03-9766. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the isophorone, xylene, and methyl isobutyl ketone (MIBK) emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on the coating 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 pollutants 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 summarizes the results of the modeling for these pollutants:

Pollutant: isophorone
 TLV (microgram/m³): 28
 Maximum Hourly Emission Rate (lbs/hr): 6.57
 Predicted 1-Hour Max. Concentration (microgram/m³): 0.48
 MAGLC (microgram/m³): 0.49

Pollutant: xylene
 TLV (microgram/m³): 434
 Maximum Hourly Emission Rate (lbs/hr): 1.22
 Predicted 1-Hour Max. Concentration (microgram/m³): 0.09
 MAGLC (microgram/m³): 10.33

Pollutant: methyl isobutyl ketone (MIBK)
 TLV (microgram/m³): 205
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Max. Concentration (microgram/m³): 0.11
 MAGLC (microgram/m³): 4.48

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 a new PTI and/or modifications to the operating permit:

- a. Any change in the composition of the coatings or use of new coatings that would result in an increase in emissions of "Hazardous Air Pollutants" (HAPs) as defined in OAC 3745-77-01.
- b. Any change in the composition of the coatings or use of new coatings that would result in the emission of a more toxic compound than was previously emitted.
- c. Any change in the composition of the coatings or use of new coatings that would result in the emissions of any organic compound excluded from the definition of "VOC" in OAC 3745-21-01 (B)(6).
- d. Any change to the emissions unit or its exhaust characteristics that would result in an exceedance of the Maximum Acceptable Ground-Level Concentration (MAGLC) of air toxics beyond plant property lines.
- e. Any change in an 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 3745-31-01.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:

- a. the name and identification number of each coating, as applied;
- b. the VOC content of each coating, as applied, in pounds per gallon;
- c. the number of gallons of each coating employed;
- d. the total uncontrolled VOC emissions from all coatings employed, in pounds or tons; and
- e. the total controlled VOC emissions from all coatings, in pounds or tons. (The controlled VOC emissions shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

- 1. 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.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation-
11.10 lbs VOC/hour

Applicable Compliance Method-
The permittee shall use the results of the control efficiency tests required pursuant to section A.V. of this permit to demonstrate compliance with the above emission limitation. The test results from section A.V. shall be converted to a mass emission rate (lbs/hr) in accordance with the requirements of 3745-21-10 (C)(7).
 - b. Emission Limitation-
48.62 tons VOC/year

Applicable Compliance Method-
Compliance with the above emission limitation shall be demonstrated by the use of recordkeeping requirements and the the following equation:

$$\text{VOC emissions (tons/year)} = \text{Summation of [VOC content of each coating, as applied (lbs/gallon) x number of gallons of each coating employed (gallons/year) x (1-overall control efficiency)] for all coatings employed.}$$

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 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 material 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 permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material 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.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. Miscellaneous Requirements

- 1. The following terms and conditions and those listed in section A.VI shall supersede the air pollution control requirements contained in the permit to install (application number 03-9766) issued for this emissions unit on October 9, 1996: B.I, B.II, B.III. and B.V.