

Facility ID: 0351010147 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 K003](#)
- [Go to Part II for Emissions Unit K004](#)
- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P002](#)

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

Facility ID: 0351010147 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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

**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 booth #1 with dry filtration system and drying ovens	OAC rule 3745-31-05(A)(3) (PTI #03-13934, issued 5/1/03)	26.25 lbs organic compound (OC)/hr from coating operations (See A.2.a. and A.2.f)
		955 lbs OC/month and 5.73 tons OC/yr from solvent wipe/cleanup operations (See B.1.)
		See A.2.b.
	OAC rule 3745-31-05(C)	42.00 tons of OC per rolling, 12-month period (See A.2.c.i. and B.2-B.3.)
	OAC rule 3745-21-07(G)(2)	Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs. (See A.2.c.ii.)
	OAC rule 3745-21-09(U)(1)(d)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day (See A.2.d.)
		3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (See A.2.e.)

**2. Additional Terms and Conditions**

- (a) This emissions unit is subject to 26.25 lbs OC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section A.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D). The permittee has requested the following federally enforceable emission limitations for purposes of avoiding Title V applicability:
  - i. 42.00 tons OC per rolling 12-month period based on coating content and usage restrictions. (See B.2 and B.3)

For purposes of federal enforceability, limitations on OC's effectively limit emissions of VOCs.

  - ii. Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions

from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.

The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

**B. Operational Restrictions**

1. The use of photochemically reactive material for solvent wipe/cleanup operations in this emissions unit is prohibited. Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).
2. The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.
3. The maximum annual coating usage rate for this emissions unit shall not exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

1. The permittee shall maintain monthly records that document whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
2. On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the company name and identification for each coating employed on a non-metal substrate;
  - b. the number of gallons of each coating applied on a non-metal substrate;
  - c. the organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
  - d. the total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day (C.2.b x C.2.c);
  - e. the total number of hours the emissions unit was involved in the operation of coating of non-metal substrates;
  - f. the average hourly organic compound emission rate involving the operation of coating non-metal substrates (C.2.d/C.2.e.), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information when any coating is applied to a metal substrate:
  - a. the company name and identification for each coating employed on a metal substrate;
  - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2.
4. In conjunction with the coating information required above, the permittee shall collect and record the following information each month for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all coatings employed (summation of C.4.c);
  - e. the annual coating usage for all coatings employed, based upon a rolling 12-month summation of the monthly usage rates;
  - f. the OC emission rate for each coating (C.4.b x C.4.c), in pounds per month;
  - g. the total OC emission rate for all coatings (summation of C.4.f), in pounds or tons per month; and
  - h. the annual OC emissions from all coatings, based upon a rolling 12-month summation of the monthly OC emissions.
5. The permittee shall collect and record the following each month for solvent wipe/cleanup operations:
  - a. the name and identification of each solvent wipe/cleanup material employed;
  - b. documentation as to whether or not each solvent wipe/cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
  - c. the OC content of each solvent wipe/cleanup material employed, in pounds per gallon;
  - d. the number of gallons of each solvent wipe/cleanup material employed;
  - e. the OC emissions from each solvent wipe/cleanup material employed (C.5.c x C.5.d), in pounds per month;
  - f. the total OC emissions from all solvent wipe/cleanup materials employed (summation of C.5.e), in pounds or

tons per month; and

g. the annual year to date OC emissions from solvent wipe/cleanup operations, in tons per year (summation of C.5.f for each calendar month to date from January to December).

The company may calculate OC emissions from solvent wipe/cleanup operations in accordance with the following formula if waste solvent wipe/cleanup materials are sent off-site for reclamation/disposal:

OC emissions from solvent wipe/cleanup operations = (total gallons of solvent wipe/cleanup material used x solvent density of solvent wipe/cleanup material) - (total gallons solvent wipe/cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

6. The permittee shall collect and record the following HAP information each month for emission units K003 and K004 combined:
- the company identification of each coating and solvent wipe/cleanup material employed;
  - the amount of each individual HAP in each coating and solvent wipe/ cleanup material, in lbs/gallon, as applied;
  - the number of gallons of each coating and solvent wipe/ cleanup material employed;
  - the emission rate for each individual HAP from each coating and solvent wipe/ cleanup material employed (C.6.b x C.6.c), in lbs/month;
  - the total emission rate for each individual HAP from all coatings and solvent wipe/ cleanup materials employed (summation of C.5.d for each individual HAP), in lbs/month;
  - the total HAP emission rate for all HAPs combined from all coatings and solvent wipe/cleanup materials employed (summation of C.5.e for all HAPs), in lbs/month; and
  - the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of monthly emissions.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

7. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-AEROMOD PRIME (version 4.60) model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-AEROMOD PRIME (version 4.60) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl N-Amyl Ketone

TLV (mg/m3): 233,497

Maximum Hourly Emission Rate (lbs/hr): 8.70 (point and fugitive combined for K003-K004)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): XXXX5

MAGLC (ug/m3): XXXX6

8. 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:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists (ACGIHs) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - changes in the composition 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
  - 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.).
9. 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) meet(s) the definition of a "modification" under other provisions of the rule, 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 evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- documentation of the 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. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds the 3.50 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. for the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition C.2.f exceeded 8 pounds per hour.
  - b. for the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition C.2.d exceeded 40 pounds per day.
  - c. any exceedances of the 42.00 tons OC per rolling 12-month period as specified in section A.2.c.i.
  - d. any exceedances of the maximum annual coating usage rate not to exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
  - e. any exceedances of the OC content of any coating employed not to exceed 3.50 lbs per gallon, as applied.
  - f. any exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.c.ii.,
  - g. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.c.ii.
  - h. any exceedances of the 955 lbs OC/month from solvent wipe/cleanup operations.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the 5.73 tons OC/yr from solvent wipe/cleanup operations. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of photochemically reactive material for solvent wipe/cleanup operations in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation: 26.25 lbs OC/hr from coating operations  
  
Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.  
  
\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 7.5 gallons per hour and a maximum OC content of 3.50 pounds per gallon.  
  
If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitation: 955 lbs OC/month from solvent wipe/cleanup operations  
  
Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.5.  
Emission Limitation: 5.73 TPY VOC from solvent wipe/cleanup operations  
  
Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.5.  
Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day (See A.2.d)  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.  
  
If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (See A.2.e)  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.  
Emission Limitation: 42.00 tons of OC per rolling, 12-month period  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section

- C.4. Emission Limitation: Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP, or 25 tons per rolling 12-month period for any combination of HAPs. (See A.2.c.ii)
- Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.6.
- Emission Limitation: The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.
- Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.b.
- Emission Limitation: The maximum annual coating usage rate for this emissions unit shall not exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
- Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.e.

**F. Miscellaneous Requirements**

- 1. None

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

Facility ID: 0351010147 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

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

**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 booth #2 with dry filtration system and drying ovens	OAC rule 3745-31-05(A)(3) (PTI #03-13934, issued 5/1/03)	26.25 lbs organic compound (OC)/hr from coating operations (See A.2.a. and A.2.f)
		955 lbs OC/month and 5.73 tons OC/yr from solvent wipe/cleanup operations (See B.1.)
		See A.2.b.
	OAC rule 3745-31-05(C)	42.00 tons of OC per rolling, 12-month period (See A.2.c.i. and B.2-B.3.)
	OAC rule 3745-21-07(G)(2)	Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs. (See A.2.c.ii.)
	OAC rule 3745-21-09(U)(1)(d)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day (See A.2.d.)
		3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (See A.2.e.)

**2. Additional Terms and Conditions**

- (a) This emissions unit is subject to 26.25 lbs OC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section A.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)

(1)(d), OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).

The permittee has requested the following federally enforceable emission limitations for purposes of avoiding Title V applicability:

i. 42.00 tons OC per rolling 12-month period based on coating content and usage restrictions. (See B.2 and B.3)

For purposes of federal enforceability, limitations on OC's effectively limit emissions of VOCs.

ii. Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs.

This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.

The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

**B. Operational Restrictions**

1. The use of photochemically reactive material for solvent wipe/cleanup operations in this emissions unit is prohibited. Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).
2. The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.
3. The maximum annual coating usage rate for this emissions unit shall not exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

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

1. The permittee shall maintain monthly records that document whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
2. On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the company name and identification for each coating employed on a non-metal substrate;
  - b. the number of gallons of each coating applied on a non-metal substrate;
  - c. the organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
  - d. the total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day (C.2.b x C.2.c);
  - e. the total number of hours the emissions unit was involved in the operation of coating of non-metal substrates;
  - f. the average hourly organic compound emission rate involving the operation of coating non-metal substrates (C.2.d/C.2.e.), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information when any coating is applied to a metal substrate:
  - a. the company name and identification for each coating employed on a metal substrate;
  - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2.
4. In conjunction with the coating information required above, the permittee shall collect and record the following information each month for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all coatings employed (summation of C.4.c);
  - e. the annual coating usage for all coatings employed, based upon a rolling 12-month summation of the monthly usage rates;
  - f. the OC emission rate for each coating (C.4.b x C.4.c), in pounds per month;
  - g. the total OC emission rate for all coatings (summation of C.4.f), in pounds or tons per month; and
  - h. the annual OC emissions from all coatings, based upon a rolling 12-month summation of the monthly OC emissions.

5. The permittee shall collect and record the following each month for solvent wipe/cleanup operations:
- the name and identification of each solvent wipe/cleanup material employed;
  - documentation was to whether or not each solvent wipe/cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
  - the OC content of each solvent wipe/cleanup material employed, in pounds per gallon;
  - the number of gallons of each solvent wipe/cleanup material employed;
  - the OC emissions from each solvent wipe/cleanup material employed (C.5.c x C.5.d), in pounds per month;
  - the total OC emissions from all solvent wipe/cleanup materials employed (summation of C.5.e), in pounds or tons per month; and
  - the annual year to date OC emissions from solvent wipe/cleanup operations, in tons per year (summation of C.5.f for each calendar month to date from January to December).

The company may calculate OC emissions from solvent wipe/cleanup operations in accordance with the following formula if waste solvent wipe/cleanup materials are sent off-site for reclamation/disposal:

OC emissions from solvent wipe/cleanup operations = (total gallons of solvent wipe/cleanup material used x solvent density of solvent wipe/cleanup material) - (total gallons solvent wipe/cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

6. The permittee shall collect and record the following HAP information each month for emission units K003 and K004 combined:
- the company identification of each coating and solvent wipe/cleanup material employed;
  - the amount of each individual HAP in each coating and solvent wipe/ cleanup material, in lbs/gallon, as applied;
  - the number of gallons of each coating and solvent wipe/ cleanup material employed;
  - the emission rate for each individual HAP from each coating and solvent wipe/ cleanup material employed (C.6.b x C.6.c), in lbs/month;
  - the total emission rate for each individual HAP from all coatings and solvent wipe/ cleanup materials employed (summation of C.5.d for each individual HAP), in lbs/month;
  - the total HAP emission rate for all HAPs combined from all coatings and solvent wipe/cleanup materials employed (summation of C.5.e for all HAPs), in lbs/month; and
  - the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of monthly emissions.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

7. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-AEROMOD PRIME (version 4.60) model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-AEROMOD PRIME (version 4.60) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl N-Amyl Ketone  
 TLV (mg/m3): 233,497  
 Maximum Hourly Emission Rate (lbs/hr): 8.70 (point and fugitive combined for K003-K004)  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): XXXX5  
 MAGLC (ug/m3): XXXX6

8. 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:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists (ACGIHs) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - changes in the composition 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
  - 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.).

9. 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) meet(s) the definition of a "modification" under other provisions of the rule, 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 evaluations 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 the 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. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds the 3.50 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. for the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition C.2.f exceeded 8 pounds per hour.
  - b. for the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition C.2.d exceeded 40 pounds per day.
  - c. any exceedances of the 42.00 tons OC per rolling 12-month period as specified in section A.2.c.i.
  - d. any exceedances of the maximum annual coating usage rate not to exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
  - e. any exceedances of the OC content of any coating employed not to exceed 3.50 lbs per gallon, as applied.
  - f. any exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.c.ii.,
  - g. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.c.ii.
  - h. any exceedances of the 955 lbs OC/month from solvent wipe/cleanup operations.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the 5.73 tons OC/yr from solvent wipe/cleanup operations. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of photochemically reactive material for solvent wipe/cleanup operations in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation: 26.25 lbs OC/hr from coating operations  
  
Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.  
  
\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 7.5 gallons per hour and a maximum OC content of 3.50 pounds per gallon.  
  
If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitation: 955 lbs OC/month from solvent wipe/cleanup operations  
  
Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.5.  
Emission Limitation: 5.73 TPY VOC from solvent wipe/cleanup operations  
  
Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section C.5.  
Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day (See A.2.d)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit (See A.2.e)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.  
Emission Limitation: 42.00 tons of OC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.  
Emission Limitation: Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP, or 25 tons per rolling 12-month period for any combination of HAPs. (See A.2.c.ii)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.6.  
Emission Limitation: The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.b.  
Emission Limitation: The maximum annual coating usage rate for this emissions unit shall not exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.e.

**F. Miscellaneous Requirements**

- 1. None

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

**Facility ID: 0351010147 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate**

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

**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>
wood line #1, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule. See A.2.c See A.2.a. See A.2.b. 2.23 pounds (lbs) PE/hr, 9.77 tons PE/yr
	OAC rule 3745-17-11(B)(2)	
	OAC rule 3745-17-07(B)	
	OAC rule 3745-17-08	
	OAC rule 3745-35-07(B)	

**2. Additional Terms and Conditions**

- (a) This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e). This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B)

**B. Operational Restrictions**

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

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

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation: Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation pursuant to OAC rule 3745-17-03(B)(1).  
Emission Limitation: 2.23 lbs PE/hr and 9.97 tons PE/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the the maximum baghouse outlet grain loading concentration of 0.02 gr/dscf by the baghouse's maximum volumetric air flow rate (13,000 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

The tons/yr was established by multiplying the lbs/hr limit by a maximum operating schedule of 8760 hrs/yr and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

**F. Miscellaneous Requirements**

- 1. None

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

Facility ID: 0351010147 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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

**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>
wood line #2, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. See A.2.a. 0.02 grain (gr) PE/dry standard cubic foot (dscf), 2.23
	OAC rule 3745-17-11(B)(2)	
	OAC rule 3745-31-05(A)(3)	

(PTI #03-13263, issued 8/12/03) lbs PE/hr, 9.77 TPY PE

See A.2.b. and A.2.c

**2. Additional Terms and Conditions**

- (a) The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with a maximum outlet concentration of 0.02 gr/dscf. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (A).

**B. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

**D. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**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: 0.02 gr/dscf, 2.23 lbs PE/hr, 9.77 TPY PE

Applicable Compliance Method: The 0.02 gr PE/dscf limit is the established maximum outlet grain loading concentration for the baghouse. The permittee shall demonstrate compliance with the lbs/hr limit by multiplying the maximum baghouse outlet grain loading concentration of 0.02 gr/dscf by the baghouse's maximum volumetric air flow rate (13,000 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour.

If required, compliance with the gr PE/dscf and lb/hr limitations shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The TPY limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation: Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

**F. Miscellaneous Requirements**

1. None