

Facility ID: 0354000124 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 K005](#)
- [Go to Part II for Emissions Unit K009](#)
- [Go to Part II for Emissions Unit K010](#)
- [Go to Part II for Emissions Unit K011](#)
- [Go to Part II for Emissions Unit K012](#)

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Facility ID: 0354000124 Emissions Unit ID: K005 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 dip tank 4	OAC rule 3745-31-05(A)(3) (PTI 03-13936 issued April 22, 2003)	47.5 lbs organic compounds (OC)/day for coatings 215.5 lbs OC/month for cleanup /makeup solvent
	OAC rule 3745-31-05(C)	See A.2.a. 4.85 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (See A.2.b)
		9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (See A.2.b)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

- (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e) and OAC rule 3745-31-05(C).
The permittee has requested a federally enforceable limitation for this emissions unit of 4.85 tons of OC (See section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 20 tons of combined HAPs per rolling, 12-month period (See section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 4.75 lbs/gallon. The maximum annual coating usage for this emissions unit shall not exceed 1500 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. Compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.
2. The OC content of cleanup/makeup solvent used in this emissions unit shall not exceed 7.39 lbs/gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 350 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. Compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.
3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not

exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions. Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in this emission unit:
 - a. the company name and identification for each coating employed;
 - b. the OC content of each coating, as applied, in lbs/gal;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of coating employed, summation of (c)
 - e. the OC emission rate for each coating, (b) x (c), in lbs/day; and
 - f. the total OC emission rate for all coatings, summation of (e).
2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for this emissions unit: the annual emissions of OC for coatings, based on a rolling, 12-month summation, in tons.
3. The permittee shall collect and record the following each month for cleanup /makeup solvent material usage in this emission unit:
 - a. the company name and identification for each solvent material employed;
 - b. the OC content of each solvent material, in lbs/gallon;
 - c. the number of gallons of each solvent material employed;
 - d. the OC emission rate for each solvent material, (b) x (c), in lbs per month; and
 - e. the total OC emission rate for all solvent materials, summation of (d) converted to tons per month.
4. In conjunction with the records specified in C.3 above, the permittee shall also record the following each month for this emissions unit: the total annual emissions of OC for cleanup/makeup solvent, based on a rolling, 12-month summation, in tons.
5. The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K005, K009, K010, K011, and K012, combined:
 - a. the company identification of each coating and solvent material employed;
 - b. the lbs per gallon of each HAP in each coating and solvent material, as applied;
 - c. the number of gallons of each coating and solvent material employed;
 - d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c), in lbs/month;
 - e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d), in lbs/month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, summation of (e), in lbs/month; and
 - g. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.
6. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:
 - a. the cumulative gallon usage rate for each coating;
 - b. the total number of gallons of all coatings;
 - c. the cumulative gallon usage rate or each solvent material;
 - d. the total number of gallons of all solvent material; and,
 - e. the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.
7. The permit to install for emission units K005, K009, K010, K011, and K012, was evaluated based on the actual materials (adhesive) and the design parameters of each 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 these emission units 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: xylene
 TLV (mg/m3): 435
 Maximum Hourly Emission Rate (lbs/hr): 29.56
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1960

MAGLC (ug/m3): 10,350

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:
 - a. changes in the composition of the materials used (mold release agent), 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 value 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.).
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) 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.
10. 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. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;
 - c. any exceedances of the 4.85 tons OC per rolling, 12-month period;
 - d. any exceedances of the 4.75 lbs OC/gallon of coating;
 - e. any exceedances of the 7.39 lbs OC/gallon of cleanup/makeup solvent;
 - f. any exceedance of the 47.5 lbs OC/day for coatings; and
 - g. any exceedances of the 215.5 lbs OC/month for cleanup /makeup solvent.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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:
47.5 lbs OC/day for coatings
4.75 lbs OC /gallon of coating

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in C.1.
Emission Limitation:
215.5 lbs OC /month for cleanup /makeup solvent
7.39 lbs OC /gallon of cleanup /makeup solvent

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in C.3.
Emission Limitation:
4.85 tons OC per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in C.4 and C.6.

Emission Limitation:
not more than 10 gallons of coating usage per day

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in C.1.d.
Emission Limitation:
9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in C.5.

2. Formulation data or US EPA Method 24 shall be used to determine the OC content of the coatings.

F. Miscellaneous Requirements

1. None

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Facility ID: 0354000124 Emissions Unit ID: K009 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 dip tank 8	OAC rule 3745-31-05(A)(3) (PTI 03-13936 issued April 22, 2003)	47.5 lbs organic compounds (OC)/day for coatings 215.5 lbs OC/month for cleanup /makeup solvent
	OAC rule 3745-31-05(C)	See A.2.a. 4.85 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (See A.2.b)
	OAC rule 3745-21-09(U)(2)(e)(iii)	9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (See A.2.b) VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

(a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e) and OAC rule 3745-31-05(C).
The permittee has requested a federally enforceable limitation for this emissions unit of 4.85 tons of OC (See section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 20 tons of combined HAPs per rolling, 12-month period (See section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 4.75 lbs/gallon. The maximum annual coating usage for this emissions unit shall not exceed 1500 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. Compliance with the annual

coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

2. The OC content of cleanup/makeup solvent used in this emissions unit shall not exceed 7.39 lbs/gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 350 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. Compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.
3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions. Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in this emission unit:
 - a. the company name and identification for each coating employed;
 - b. the OC content of each coating, as applied, in lbs/gal;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of coating employed, summation of (c)
 - e. the OC emission rate for each coating, (b) x (c), in lbs/day; and
 - f. the total OC emission rate for all coatings, summation of (e).
2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for this emissions unit: the annual emissions of OC for coatings, based on a rolling, 12-month summation, in tons.
3. The permittee shall collect and record the following each month for cleanup /makeup solvent material usage in this emission unit:
 - a. the company name and identification for each solvent material employed;
 - b. the OC content of each solvent material, in lbs/gallon;
 - c. the number of gallons of each solvent material employed;
 - d. the OC emission rate for each solvent material, (b) x (c), in lbs per month; and
 - e. the total OC emission rate for all solvent materials, summation of (d) converted to tons per month.
4. In conjunction with the records specified in C.3 above, the permittee shall also record the following each month for this emissions unit: the total annual emissions of OC for cleanup/makeup solvent, based on a rolling, 12-month summation, in tons.
5. The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K005, K009, K010, K011, and K012, combined:
 - a. the company identification of each coating and solvent material employed;
 - b. the lbs per gallon of each HAP in each coating and solvent material, as applied;
 - c. the number of gallons of each coating and solvent material employed;
 - d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c), in lbs/month;
 - e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d), in lbs/month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, summation of (e), in lbs/month; and
 - g. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.
6. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:
 - a. the cumulative gallon usage rate for each coating;
 - b. the total number of gallons of all coatings;
 - c. the cumulative gallon usage rate or each solvent material;
 - d. the total number of gallons of all solvent material; and,
 - e. the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.
7. The permit to install for emission units K005, K009, K010, K011, and K012, was evaluated based on the actual materials (adhesive) and the design parameters of each 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 these emission units 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: xylene
 TLV (mg/m3): 435
 Maximum Hourly Emission Rate (lbs/hr): 29.56
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1960
 MAGLC (ug/m3): 10,350

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:
 - a. changes in the composition of the materials used (mold release agent), 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 value 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.).
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) 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.
10. 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. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;
 - c. any exceedances of the 4.85 tons OC per rolling, 12-month period;
 - d. any exceedances of the 4.75 lbs OC/gallon of coating;
 - e. any exceedances of the 7.39 lbs OC/gallon of cleanup/makeup solvent;
 - f. any exceedance of the 47.5 lbs OC/day for coatings; and
 - g. any exceedances of the 215.5 lbs OC/month for cleanup /makeup solvent.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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:
 47.5 lbs OC/day for coatings
 4.75 lbs OC /gallon of coating

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.1.
 Emission Limitation:
 215.5 lbs OC /month for cleanup /makeup solvent

7.39 lbs OC /gallon of cleanup /makeup solvent

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.3.
 Emission Limitation:
 4.85 tons OC per rolling, 12-month period

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.4 and C.6.
 Emission Limitation:
 not more than 10 gallons of coating usage per day

Applicable Compliance Method:
 Compliance shall be based upon the record keeping requirements as specified in C.1.d.
 Emission Limitation:
 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

Applicable Compliance Method:
 Compliance shall be based upon the record keeping requirements as specified in C.5.

2. Formulation data or US EPA Method 24 shall be used to determine the OC content of the coatings.

F. Miscellaneous Requirements

1. None

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Facility ID: 0354000124 Emissions Unit ID: K010 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 dip tank 9	OAC rule 3745-31-05(A)(3) (PTI 03-13936 issued April 22, 2003)	47.5 lbs organic compounds (OC)/day for coatings 215.5 lbs OC/month for cleanup /makeup solvent
	OAC rule 3745-31-05(C)	See A.2.a. 4.85 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (See A.2.b) 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (See A.2.b)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

- (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e) and OAC rule 3745-31-05(C). The permittee has requested a federally enforceable limitation for this emissions unit of 4.85 tons of OC (See section B.1 and B.2). The permittee has also requested federally enforceable limitations for

emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 20 tons of combined HAPs per rolling, 12-month period (See section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V /MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 4.75 lbs/gallon. The maximum annual coating usage for this emissions unit shall not exceed 1500 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. Compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.
2. The OC content of cleanup/makeup solvent used in this emissions unit shall not exceed 7.39 lbs/gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 350 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. Compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.
3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions. Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in this emission unit:
 - a. the company name and identification for each coating employed;
 - b. the OC content of each coating, as applied, in lbs/gal;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of coating employed, summation of (c)
 - e. the OC emission rate for each coating, (b) x (c), in lbs/day; and
 - f. the total OC emission rate for all coatings, summation of (e).
2. In conjunction with the records specified in C.1 above, the permittee shall also record the following each month for this emissions unit: the annual emissions of OC for coatings, based on a rolling, 12-month summation, in tons.
3. The permittee shall collect and record the following each month for cleanup /makeup solvent material usage in this emission unit:
 - a. the company name and identification for each solvent material employed;
 - b. the OC content of each solvent material, in lbs/gallon;
 - c. the number of gallons of each solvent material employed;
 - d. the OC emission rate for each solvent material, (b) x (c), in lbs per month; and
 - e. the total OC emission rate for all solvent materials, summation of (d) converted to tons per month.
4. In conjunction with the records specified in C.3 above, the permittee shall also record the following each month for this emissions unit: the total annual emissions of OC for cleanup/makeup solvent, based on a rolling, 12-month summation, in tons.
5. The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K005, K009, K010, K011, and K012, combined:
 - a. the company identification of each coating and solvent material employed;
 - b. the lbs per gallon of each HAP in each coating and solvent material, as applied;
 - c. the number of gallons of each coating and solvent material employed;
 - d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c), in lbs/month;
 - e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d), in lbs/month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, summation of (e), in lbs/month; and
 - g. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.
6. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:
 - a. the cumulative gallon usage rate for each coating;
 - b. the total number of gallons of all coatings;
 - c. the cumulative gallon usage rate or each solvent material;

- d. the total number of gallons of all solvent material; and,
 - e. the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.
- 7. The permit to install for emission units K005, K009, K010, K011, and K012, was evaluated based on the actual materials (adhesive) and the design parameters of each 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 these emission units 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: xylene
 TLV (mg/m3): 435
 Maximum Hourly Emission Rate (lbs/hr): 29.56
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1960
 MAGLC (ug/m3): 10,350
- 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:
 - a. changes in the composition of the materials used (mold release agent), 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 value 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.).
- 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) 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.
- 10. 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. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;
 - c. any exceedances of the 4.85 tons OC per rolling, 12-month period;
 - d. any exceedances of the 4.75 lbs OC/gallon of coating;
 - e. any exceedances of the 7.39 lbs OC/gallon of cleanup/makeup solvent;
 - f. any exceedance of the 47.5 lbs OC/day for coatings; and
 - g. any exceedances of the 215.5 lbs OC/month for cleanup /makeup solvent.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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:
 47.5 lbs OC/day for coatings
 4.75 lbs OC /gallon of coating

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.1.

Emission Limitation:
 215.5 lbs OC /month for cleanup /makeup solvent
 7.39 lbs OC /gallon of cleanup /makeup solvent

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.3.

Emission Limitation:
 4.85 tons OC per rolling, 12-month period

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.4 and C.6.

Emission Limitation:
 not more than 10 gallons of coating usage per day

Applicable Compliance Method:
 Compliance shall be based upon the record keeping requirements as specified in C.1.d.

Emission Limitation:
 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

Applicable Compliance Method:
 Compliance shall be based upon the record keeping requirements as specified in C.5.

2. Formulation data or US EPA Method 24 shall be used to determine the OC content of the coatings.

F. Miscellaneous Requirements

1. None

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

Facility ID: 0354000124 Emissions Unit ID: K011 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 2 - with dry filters	OAC rule 3745-31-05(A)(3) (PTI 03-13936 issued April 22, 2003)	24.5 lbs organic compounds (OC)/hr for coatings 219 lbs OC/month for cleanup solvent
	OAC rule 3745-31-05(C)	See A.2.a 18.82 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (See A.2.b)
		9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (See A.2.b)

OAC rule 3745-21-09(U)(1)(c) 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, for extreme performance coatings

2. Additional Terms and Conditions

- (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(C).
The permittee has requested a federally enforceable limitation for this emissions unit of 18.82 tons of OC (See section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 21.5 tons of combined HAPs per rolling, 12-month period (See section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V/MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 3.5 lbs/gallon as applied. The maximum annual coating usage for this emissions unit shall not exceed 10,000 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. Compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.
2. The OC content of cleanup solvent used in this emissions unit shall not exceed 7.20 lbs/gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 365 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. Compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.
3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions. Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following each month for coating and cleanup solvent material usage in this emission unit:
 - a. the company name and identification for each coating and solvent material employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [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.];
 - c. the OC content of each coating, as applied, and solvent material, in lbs/gallon;
 - d. the number of gallons of each coating and solvent material employed;
 - e. the OC emission rate for each coating and solvent material, (c) x (d), in lbs per month;
 - f. the total OC emission rate for all coating and solvent materials, summation of (e) converted to tons per month, and
 - g. the annual emissions of OC for coating and solvent materials, based on a rolling, 12-month summation.
2. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:
 - a. the cumulative gallon usage rate for each coating;
 - b. the total number of gallons of all coatings;
 - c. the cumulative gallon usage rate of each solvent material;
 - d. the total number of gallons of all solvent material; and,
 - e. the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.
3. The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K005, K009, K010, K011, and K012, combined:
 - a. the company identification of each coating and solvent material employed;
 - b. the lbs per gallon of each HAP in each coating and solvent material, as applied;
 - c. the number of gallons of each coating and solvent material employed;
 - d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c), in lbs/month;
 - e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d), in lbs/month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, summation of (e), in lbs/month; and
 - g. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

4. The permit to install for emission units K005, K009, K010, K011, and K012, was evaluated based on the actual materials (adhesive) and the design parameters of each 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 these emission units 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: xylene
 TLV (mg/m3): 435
 Maximum Hourly Emission Rate (lbs/hr): 29.56
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1960
 MAGLC (ug/m3): 10,350

5. 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 (mold release agent), 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 value 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.).
6. 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.
7. 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. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:
- a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;
 - c. any exceedances of the 3.5 lbs OC/gallon of coating;
 - d. any exceedances of the 18.82 tons OC per rolling, 12-month period;
 - e. any exceedances of the 7.20 lbs OC/gallon of cleanup solvent;
 - f. any exceedances of the 219 lbs OC/month for cleanup /makeup solvent.
- The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of VOC noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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:
 24.5 lbs OC/hr for coatings
- Applicable Compliance Method:
 The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a maximum gallon usage of 7.00 gal/hr and a maximum OC content of 3.50 lbs/gal.
 Emission Limitation:
 3.5 lbs OC/gallon of coating
 219 lbs OC/month for cleanup solvent
 7.2 lbs OC/gallon of cleanup solvent

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.1.
 Emission Limitation:
 18.82 tons OC per rolling, 12-month period

Applicable Compliance Method:
 Compliance shall be based on the record keeping requirements as specified in C.1.
 Emission Limitation:
 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
 Compliance shall be based upon the record keeping requirements as specified in C.1.b.
 Emission Limitation:
 9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

Applicable Compliance Method:
 Compliance shall be based upon the record keeping requirements as specified in C.3.

- 2. Formulation data or US EPA Method 24 shall be used to determine the OC/VOC content of the coatings.
- F. **Miscellaneous Requirements**
- 1. None

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

Facility ID: 0354000124 Emissions Unit ID: K012 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 3 - with dry filters	OAC rule 3745-31-05(A)(3) (PTI 03-13936 issued April 22, 2003)	24.5 lbs organic compounds (OC)/hr for coatings 219 lbs OC/month for cleanup solvent
	OAC rule 3745-31-05(C)	See A.2.a 18.82 tons OC per rolling, 12-month period based on coating and solvent usage and OC content restrictions (See A.2.b)
	OAC rule 3745-21-09(U)(1)(c)	9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined (See A.2.b) 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, for extreme performance coatings

- 2. **Additional Terms and Conditions**

- (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U) (1)(c) and OAC rule 3745-31-05(C). The permittee has requested a federally enforceable limitation for this emissions unit of 18.82 tons of OC (See section B.1 and B.2). The permittee has also requested federally enforceable limitations for emissions units K005, K009, K010, K011, and K012, combined, of 9.9 tons of any individual HAP, and 21.5 tons of combined HAPs per rolling, 12-month period (See section B.3). Federally enforceable OC and HAP limitations are being established for the purpose of avoiding Title V/MACT applicability. Federally enforceable OC limitations limit the Potential to Emit on VOC's.

B. Operational Restrictions

1. The OC content of coatings used in this emissions unit shall not exceed 3.5 lbs/gallon as applied. The maximum annual coating usage for this emissions unit shall not exceed 10,000 gallons. The annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rate. Compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.
2. The OC content of cleanup solvent used in this emissions unit shall not exceed 7.20 lbs/gallon. The maximum annual solvent material usage for this emissions unit shall not exceed 365 gallons. The annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rate. Compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the monthly solvent usage rates.
3. Combined annual HAP emissions from emissions units K005, K009, K010, K011, and K012, combined, shall not exceed 9.9 tons per year for any individual HAP and 20 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions. Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following each month for coating and cleanup solvent material usage in this emission unit:
 - a. the company name and identification for each coating and solvent material employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [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.];
 - c. the OC content of each coating, as applied, and solvent material, in lbs/gallon;
 - d. the number of gallons of each coating and solvent material employed;
 - e. the OC emission rate for each coating and solvent material, (c) x (d), in lbs per month;
 - f. the total OC emission rate for all coating and solvent materials, summation of (e) converted to tons per month, and
 - g. the annual emissions of OC for coating and solvent materials, based on a rolling, 12-month summation.
2. In addition to the above information, the permittee shall also record the following information for each month for this emission unit:
 - a. the cumulative gallon usage rate for each coating;
 - b. the total number of gallons of all coatings;
 - c. the cumulative gallon usage rate of each solvent material;
 - d. the total number of gallons of all solvent material; and,
 - e. the annual number of gallons of all coatings and solvents based upon a rolling, 12-month summation of the coating and solvent material usage rates.
3. The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K005, K009, K010, K011, and K012, combined:
 - a. the company identification of each coating and solvent material employed;
 - b. the lbs per gallon of each HAP in each coating and solvent material, as applied;
 - c. the number of gallons of each coating and solvent material employed;
 - d. the emission rate for each HAP from each coating and solvent material employed, (b) x (c), in lbs/month;
 - e. the total emission rate for each HAP from all coatings and solvent materials employed, summation of (d), in lbs/month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, summation of (e), in lbs/month; and
 - g. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.
4. The permit to install for emission units K005, K009, K010, K011, and K012, was evaluated based on the actual materials (adhesive) and the design parameters of each 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 these emission units 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: xylene
 TLV (mg/m3): 435
 Maximum Hourly Emission Rate (lbs/hr): 29.56
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1960
 MAGLC (ug/m3): 10,350

5. 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 (mold release agent), 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 value 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.).
6. 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.
7. 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. The permittee shall submit deviation (excursion) reports for this emissions unit which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable gallon usage rates specified in paragraphs B.1 and B.2.;
 - b. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph B.3.;
 - c. any exceedances of the 3.5 lbs OC/gallon of coating;
 - d. any exceedances of the 18.82 tons OC per rolling, 12-month period;
 - e. any exceedances of the 7.20 lbs OC/gallon of cleanup solvent;
 - f. any exceedances of the 219 lbs OC/month for cleanup /makeup solvent.

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of VOC noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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:
 24.5 lbs OC/hr for coatings

 Applicable Compliance Method:
 The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

 *The potential to emit is based on a maximum gallon usage of 7.00 gal/hr and a maximum OC content of 3.50 lbs/gal.
 Emission Limitation:

- 3.5 lbs OC/gallon of coating
- 219 lbs OC/month for cleanup solvent
- 7.2 lbs OC/gallon of cleanup solvent

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.1.

Emission Limitation:

18.82 tons OC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.1.

Emission Limitation:

3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in C.1.b.

Emission Limitation:

9.9 tons per rolling, 12-month period for any individual HAP and 20 tons per rolling 12-month period for any combination of HAPs: for emissions units K005, K009, K010, K011, and K012 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in C.3.

- 2. Formulation data or US EPA Method 24 shall be used to determine the OC/VOC content of the coatings.

F. **Miscellaneous Requirements**

- 1. None