

Facility ID: 0370010198 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 P001](#)
- [Go to Part II for Emissions Unit R001](#)
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Facility ID: 0370010198 Emissions Unit ID: P001 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>
wood waste handling system with custom cyclone and baghouse	OAC rule 3745-31-05(A)(3) (PTI #03-17077, issued 05-23-2006)	5.26 tons particulate matter less than 10 microns in size (PM10)/year (See A.2.a.) 0.02 grains PM10/dry standard cubic foot (dscf) See A.2.b.
	OAC rule 3745-17-11(B)	Opacity restrictions (See A.2.c.)
	OAC rule 3745-17-07(A)	See A.2.d. See A.2.e.

2. Additional Terms and Conditions

- (a) All emissions of particulate matter are PM10.
The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a cyclone and baghouse achieving a maximum outlet concentration of 0.02 grains PM10/dscf.
Visible particulate emissions shall not exceed 0% opacity as a six-minute average from any building opening.
The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Erie county.
This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from building egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit (stack emissions associated with this emissions unit are vented into the building). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (b) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 Emissions Limitation:
 0.02 gr PM10/dscf , 5.26 tons PM10/yr

 Applicable Compliance Method:
 The 0.02 gr PM10/dscf limitation is the established maximum outlet concentration for the baghouse. The permittee shall demonstrate compliance with the ton/yr limitation by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, the baghouse's maximum volumetric air flow rate (7,000 acfm), 60 min/hr, and a maximum operating schedule of 8,760 hrs/yr. This value is then converted to ton/yr by multiplying by lb/7000 grains and ton/2000 lb.

 If required, the permittee shall demonstrate compliance with the 0.02 gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 Emissions Limitation:
 Visible particulate emissions shall not exceed 0% opacity as a six-minute average from any building egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

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

F. Miscellaneous Requirements

1. None

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Facility ID: 0370010198 Emissions Unit ID: R001 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>
spray booth #1, with dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-17077, issued 05-23-2006)	coating operations: 2.75 lbs organic compounds (OC)/hr; 7.3 tons OC/yr (See A.2.a.)
	OAC rule 3745-31-05(C) (PTI #03-17077, issued 05-23-2006)	clean-up operations: 13.18 lbs OC/month and 0.08 ton OC/yr 9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined (See A.2.b.)
	OAC rule 3745-21-07(G)(2)	none (See A.2.c.)

2. Additional Terms and Conditions

- (a) 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.

Annual HAP emissions from emissions units R001 through R003 combined shall not exceed 9.9 tons per rolling 12-month period for an individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months, and as such, the permittee has existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. required to demonstrate compliance with this limitation.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), "Control of emissions of organic materials from stationary sources.", and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. 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 number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the OC emissions from each coating employed, in pounds (C.1.b. x C.1.c), in pounds;
 - e. the total OC emission rate for all coatings employed summation of C.1.d for all coatings), in pounds; and
 - f. the annual year to date OC emissions from coating operations, in tons per year (summation of C.3.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following each month for cleanup operations in this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed (C.3.b. x C.3.c.);
 - e. the total OC emissions from all cleanup materials employed (summation of C.3.d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.e. for each calendar month to date from January to December).
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units R001 through R003 combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b. x C.3.c.) for each individual HAP, in pounds;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d. for all coatings and cleanup materials), in pounds;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.3.e. for all HAPs for all coatings and cleanup materials), in pounds;
 - g. following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
4. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant:
2-methyl 1-propanol (isobutyl alcohol)

TLV (mg/m3):
151.57

Maximum Hourly Emission Rate (lbs/hr):
5.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):
818.01

MAGLC (ug/m3):
3608.80

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. 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

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 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 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 quarterly deviation (excursion) reports which identify any exceedances of the following:

a. all exceedances of the monthly OC emission limitation of 13.18 lbs OC/month from cleanup operations.

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R003, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall submit annual reports that summarize the following:

a. the total actual OC emissions, in tons, from coating operations;

b. the total actual OC emissions, in tons, from cleanup operations.

The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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:
2.75 lbs OC/hr; 7.3 tons OC/yr 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 0.50 gallons per hour and a maximum OC content of 5.50 pounds per gallon.

Compliance with the annual OC emissions limitation shall be based upon the record keeping requirements specified in section C.1. of this permit.

Emission Limitation:
13.18 lbs OC/month and 0.08 tons OC/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

Emission Limitation:

9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

F. **Miscellaneous Requirements**

1. The terms and conditions contained in Part II, A.1 through E.1 are federally enforceable.

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Facility ID: 0370010198 Emissions Unit ID: R002 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>
R002 - spray booth #2, with dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-17077, issued 05-23-2006)	coating operations: 2.75 lbs organic compounds (OC)/hr; 7.3 tons OC/yr (See A.2.a.)
	OAC rule 3745-31-05(C) (PTI #03-17077, issued 05-23-2006)	clean-up operations: 13.18 lbs OC/month and 0.08 ton OC/yr 9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined (See A.2.b.)
	OAC rule 3745-21-07(G)(2)	none (See A.2.c.)

2. **Additional Terms and Conditions**

- (a) 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.
Annual HAP emissions from emissions units R001 through R003 combined shall not exceed 9.9 tons per rolling 12-month period for an individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months, and as such, the permittee has existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. required to demonstrate compliance with this limitation.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), "Control of emissions of organic materials from stationary sources.", and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit.

B. **Operational Restrictions**

1. None

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

1. 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 number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the OC emissions from each coating employed, in pounds (C.1.b. x C.1.c.), in pounds;
 - e. the total OC emission rate for all coatings employed summation of C.1.d. for all coatings), in pounds; and
 - f. the annual year to date OC emissions from coating operations, in tons per year (summation of C.3.e. for each calendar month to date from January to December).

2. The permittee shall collect and record the following each month for cleanup operations in this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed (C.3.b. x C.3.c.);
 - e. the total OC emissions from all cleanup materials employed (summation of C.3.d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.e. for each calendar month to date from January to December).

3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units R001 through R003 combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b. x C.3.c.) for each individual HAP, in pounds;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d. for all coatings and cleanup materials), in pounds;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.3.e. for all HAPs for all coatings and cleanup materials), in pounds;
 - g. following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

4. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant:
2-methyl 1-propanol (isobutyl alcohol)

TLV (mg/m3):
151.57

Maximum Hourly Emission Rate (lbs/hr):
5.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):
818.01

MAGLC (ug/m3):
3608.80

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as

indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. 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

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 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 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 quarterly deviation (excursion) reports which identify any exceedances of the following:

a. all exceedances of the monthly OC emission limitation of 13.18 lbs OC/month from cleanup operations.

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R003, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall submit annual reports that summarize the following;

a. the total actual OC emissions, in tons, from coating operations;

b. the total actual OC emissions, in tons, from cleanup operations.

The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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:
2.75 lbs OC/hr; 7.3 tons OC/yr 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 0.50 gallons per hour and a maximum OC content of 5.50 pounds per gallon.

Compliance with the annual OC emissions limitation shall be based upon the record keeping requirements specified in section C.1. of this permit.

Emission Limitation:
13.18 lbs OC/month and 0.08 tons OC/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

Emission Limitation:
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

F. Miscellaneous Requirements

1. The terms and conditions contained in Part II, A.1 through E.1 are federally enforceable.

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Part II - Special Terms and Conditions

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #3, with dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-17077, issued 05-23-2006)	coating operations: 2.54 lbs organic compounds (OC)/hr; 7.3 tons OC/yr (See A.2.a.)
	OAC rule 3745-31-05(C) (PTI #03-17077, issued 05-23-2006)	clean-up operations: 13.18 lbs OC/month and 0.08 ton OC/yr 9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined (See A.2.b.)
	OAC rule 3745-21-07(G)	none (See A.2.c.)

2. Additional Terms and Conditions

- (a) 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.
Annual HAP emissions from emissions units R001 through R003 combined shall not exceed 9.9 tons per rolling 12-month period for an individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months, and as such, the permittee has existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. required to demonstrate compliance with this limitation.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.
On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), "Control of emissions of organic materials from stationary sources.", and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. 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 number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the OC emissions from each coating employed, in pounds (C.1.b. x C.1.c.), in pounds;
 - e. the total OC emission rate for all coatings employed summation of C.1.d. for all coatings), in pounds; and
 - f. the annual year to date OC emissions from coating operations, in tons per year (summation of C.3.e. for each calendar month to date from January to December).
2. The permittee shall collect and record the following each month for cleanup operations in this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;

- c. the number of gallons of each cleanup material employed;
 - d. the OC emissions from each cleanup material employed (C.3.b. x C.3.c.);
 - e. the total OC emissions from all cleanup materials employed (summation of C.3.d. for all cleanup materials) in pounds or tons; and
 - f. the annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.e. for each calendar month to date from January to December).
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units R001 through R003 combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in pounds;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings and cleanup materials), in pounds;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.3.e for all HAPs for all coatings and cleanup materials), in pounds;
 - g. following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the following:
- a. all exceedances of the monthly OC emission limitation of 13.18 lbs OC/month from cleanup operations.
 - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R003, combined).
- These reports shall be submitted in accordance with the general terms and conditions of this permit.
2. The permittee shall submit annual reports that summarize the following:
- a. the total actual OC emissions, in tons, from coating operations;
 - b. the total actual OC emissions, in tons, from cleanup operations.
- The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 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:
2.54 lbs OC/hr; 7.3 tons OC/yr 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 0.50 gallons per hour and a maximum OC content of 5.08 pounds per gallon.
- Compliance with the annual OC emissions limitation shall be based upon the record keeping requirements specified in section C.1. of this permit.
- Emission Limitation:
13.18 lbs OC/month and 0.08 tons OC/yr from cleanup operations
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.
- Emission Limitation:
9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined.
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.
- F. Miscellaneous Requirements**
1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new

permit to install. The installation of emissions unit R003 was a separate construction project from the installation of emissions units R001 and R002, therefore emissions unit R003 is not required to comply with the "Air Toxic Policy" as stated above.

2. The terms and conditions contained in Part II, A.1 through E.1 are federally enforceable.