

Facility ID: 0370010263 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.

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

Facility ID: 0370010263 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> |
|--|---|--|
| wood, laminate and fiberglass coating spray booth with spray gun and fiberglass filter | OAC rule 3745-31-05(A)(3) (PTI #03-17217, issued 01-30-2007) | 4.42 lbs Organic Compounds (OC)/hour, and 19.36 tons OC/year |
| | | See A.2.a. |
| | OAC rule 3745-31-02(A) | See A.2.b. |
| | OAC rule 3745-21-07(G) | none (See A.2.c.) |

2. Additional Terms and Conditions

- (a) The hourly emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.
 Permit to Install 03-17217 for this air contaminant source takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements for PM under OAC rule 3745-31-05(A)(3):
 - i. use of a fiberglass filter.
 OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

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 coating usage in emissions unit R001:
 - a. the company identification for each coating material employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content, in pounds per gallon, for each coating, as applied;
 - d. the OC emission rate for each coating employed, in pounds per month (C.1.c. x C.1.d.);
 - e. the total OC emission rate for all coating materials employed, in pounds per month (sum of C.1.e.);
 - f. the annual, year to date OC emissions, in tons, from all coating materials employed (sum of C.1.f. for each month to date from January to December).
2. The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The

Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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: xylene
 TLV (mg/m3): 434.192
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22.19
 MAGLC (ug/m3): 10,333.0

Pollutant: toluene
 TLV (mg/m3): 188.405
 Maximum Hourly Emission Rate (lbs/hr): 0.23
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.87
 MAGLC (ug/m3): 4,486.0

Pollutant: ethylene glycol
 TLV (mg/m3): 73.7
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22.19
 MAGLC (ug/m3): 1,755.0

Pollutant: paraffin/hydrocarbon waxes
 TLV (mg/m3): 2.0
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 19.97
 MAGLC (ug/m3): 48.0

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (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;
 - 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
 - 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 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**
- The permittee shall submit annual reports that summarize the total annual actual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. **Testing Requirements**
- 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:
 4.42 lbs OC/hr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, 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 1.0 gallon per hour and a maximum OC content of 4.42 pounds per gallon.

Emission Limitation:
19.36 tons OC/yr from coating operations

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section C.1. of this permit.

F. **Miscellaneous Requirements**

1. None