

Facility ID: 0374010077 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Boiler # 2 (6.3 MMBtu/hr), Ohio EPA emissions unit B002;
 Boiler # 4 (6.3 MMBtu/hr), Ohio EPA emissions unit B004;
 Dual Station Sanding Line, Ohio EPA emissions unit P002;
 Mini Banbury Mixer, Ohio EPA emissions unit P005;
 Rubber Router/Sander, Ohio EPA emissions unit P006;
 Four Automatic Presses, Ohio EPA emissions unit Z001;
 Four Automatic Presses, Ohio EPA emissions unit Z002;
 Water Jet Rubber Cutting, Ohio EPA emissions unit P007;
 Five, 72- inch Presses, Ohio EPA emissions unit Z004;
 Calender Mill Process Units, Ohio EPA emissions unit P008;
 Vinyl Press Area, Ohio EPA emissions unit Z014;
 "Safety Kleen" Cold Cleaner, Ohio EPA emissions unit Z015;
 Two Corner Presses, Ohio EPA emissions unit Z016;
 Rubber Line # 1 Warm Up Mill, Ohio EPA emissions unit P009;
 Rubber Line # 1 Extruder - Barbe Spray Application, Ohio EPA emissions unit R006;
 Rubber Line # 1 Autoclave, Ohio EPA emissions unit P010;
 Rubber Line # 1 Cooling Tunnel, Ohio EPA emissions unit Z020;
 Rubber Line # 3 Warm Up Mill, Ohio EPA emissions unit P011;
 Rubber Line # 3 Extruder - Barbe Spray Application, Ohio EPA emissions unit R007;
 Rubber Line #3 Autoclave, Ohio EPA emissions unit Z023;
 Rubber Line # 3 Cooling Tunnel, Ohio EPA emissions unit Z024;
 Waste Oil Reclamation and Storage Tank, Ohio EPA emissions unit Z025;
 Gasoline Dispenser, Ohio EPA emissions unit Z027;
 Boiler N (9.7 MMBtu/hr), Ohio EPA emissions unit Z028;
 Boiler S (9.7 MMBtu/hr), Ohio EPA emissions unit Z029;
 QA/QC & Research Lab, Lab Hood, Ohio EPA emissions unit Z030;
 QA/QC & Research Lab, Autoclave, Ohio EPA emissions unit Z031;
 QA/QC & Research Lab, Warmup Mill, Ohio EPA emissions unit P012;
 Sander Room Plastic Bead "maxi" Blaster, Ohio EPA emissions unit P013;
 Vinyl Press Area Cooling Tower, Ohio EPA emissions unit Z034;
 Paint Line Area Cook Tank, Ohio EPA emissions unit P014;
 Paint Storage Room, Ohio EPA emissions unit P015;

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

The following insignificant emissions units are located at this facility:

Boiler # 2 (6.3 MMBtu/hr), Ohio EPA emissions unit B002;
 Boiler # 4 (6.3 MMBtu/hr), Ohio EPA emissions unit B004;
 Dual Station Sanding Line, Ohio EPA emissions unit P002;
 Mini Banbury Mixer, Ohio EPA emissions unit P005;
 Rubber Router/Sander, Ohio EPA emissions unit P006;
 Four Automatic Presses, Ohio EPA emissions unit Z001;
 Four Automatic Presses, Ohio EPA emissions unit Z002;
 Water Jet Rubber Cutting, Ohio EPA emissions unit P007;
 Five, 72- inch Presses, Ohio EPA emissions unit Z004;
 Calender Mill Process Units, Ohio EPA emissions unit P008;
 Vinyl Press Area, Ohio EPA emissions unit Z014;

"Safety Kleen" Cold Cleaner, Ohio EPA emissions unit Z015;
Two Corner Presses, Ohio EPA emissions unit Z016;
Rubber Line # 1 Warm Up Mill, Ohio EPA emissions unit P009;
Rubber Line # 1 Extruder - Barbe Spray Application, Ohio EPA emissions unit R006;
Rubber Line # 1 Autoclave, Ohio EPA emissions unit P010;
Rubber Line # 1 Cooling Tunnel, Ohio EPA emissions unit Z020;
Rubber Line # 3 Warm Up Mill, Ohio EPA emissions unit P011;
Rubber Line # 3 Extruder - Barbe Spray Application, Ohio EPA emissions unit R007;
Rubber Line #3 Autoclave, Ohio EPA emissions unit Z023;
Rubber Line # 3 Cooling Tunnel, Ohio EPA emissions unit Z024;
Waste Oil Reclamation and Storage Tank, Ohio EPA emissions unit Z025;
Gasoline Dispenser, Ohio EPA emissions unit Z027;
Boiler N (9.7 MMBtu/hr), Ohio EPA emissions unit Z028;
Boiler S (9.7 MMBtu/hr), Ohio EPA emissions unit Z029;
QA/QC & Research Lab, Lab Hood, Ohio EPA emissions unit Z030;
QA/QC & Research Lab, Autoclave, Ohio EPA emissions unit Z031;
QA/QC & Research Lab, Warmup Mill, Ohio EPA emissions unit P012;
Sander Room Plastic Bead "maxi" Blaster, Ohio EPA emissions unit P013;
Vinyl Press Area Cooling Tower, Ohio EPA emissions unit Z034;
Paint Line Area Cook Tank, Ohio EPA emissions unit P014;
Paint Storage Room, Ohio EPA emissions unit P015;

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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- [Go to Part III for Emissions Unit P003](#)
- [Go to Part III for Emissions Unit P004](#)
- [Go to Part III for Emissions Unit R001](#)
- [Go to Part III for Emissions Unit R003](#)
- [Go to Part III for Emissions Unit R004](#)
- [Go to Part III for Emissions Unit R005](#)
- [Go to Part III for Emissions Unit Z026](#)

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0374010077 Emissions Unit ID: P001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
banbury rubber mixer - old mixer 1 (with baghouse that exhausts inside building)	OAC rule 3745-17-11	7.87 lbs particulate matter (PM) per hr
	OAC rule 3745-17-07(A)(1-3)	20% opacity, except as provided by rule

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

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V. **Testing Requirements**

1. Compliance with the emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
7.87 lbs PM /hr

Applicable Compliance Method:

To determine the actual maximum particulate rate (E), the permittee shall use the following equation:

$$E = \text{maximum process throughput* in tons per hour} \times [(EF \times (1-CE))+1.5^{***}]$$

E = particulate matter emissions rate (lbs/hr)

EF = 13.5 lb PM/ton**

CE = control efficiency of the control system (assumed to be 95 percent).

* Based on the Title V application, the maximum process throughput is 4.23 tons per hour.

** This uncontrolled emission factor from AP-42, Table 11.8-2 (originally 15 lbs PM/ton) was modified to account for 90% capture efficiency

*** This represents the uncontrolled emission factor of fugitives emissions (10% *15)

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC rule 3745-17-03(B)(10).

- b. Emission Limitation:
20% opacity, except as provided by rule

Applicable Compliance Method:

The permittee shall demonstrate compliance with the opacity limitation based upon the monitoring/recordkeeping and reporting requirements established in sections A.III. and A.IV.2 of the terms and conditions of this permit.

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. The permittee shall perform the following:
 - a. to verify the accuracy of the AP-42 emission factor indicated in section V above, the permittee shall, after issuance of this permit, perform a mass balance demonstration of uncontrolled PM emissions from this emissions unit on the first full cycle of baghouse collection (i.e. from one recovered material removal event to the next); and
 - b. the permittee shall report the above results to Ohio EPA within 10 days of completion.

The permittee may propose an alternative demonstration of verification within 30 days of permit issuance.

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Facility ID: 0374010077 Emissions Unit ID: P001 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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banbury rubber mixer - old mixer 1 (with baghouse that exhausts inside building)		
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0374010077 Emissions Unit ID: P003 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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banbury rubber mixer - mixer # 3A (with baghouse that exhausts inside building)	OAC rule 3745-17-11	7.87 lbs particulate matter (PM) per hr
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OAC rule 3745-17-07(A)(1-3) 20% opacity, except as provided by rule

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

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V. **Testing Requirements**

1. Compliance with the emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
7.87 lbs PM /hr

Applicable Compliance Method:

To determine the actual maximum particulate rate (E), the permittee shall use the following equation:

$$E = \text{maximum process throughput}^* \text{ in tons per hour } \times [(EF \times (1-CE))+1.5^{***}]$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

$$EF = 13.5 \text{ lb PM/ton}^{**}$$

$$CE = \text{control efficiency of the control system (assumed to be 95 percent).}$$

* Based on the Title V application, the maximum process throughput is 4.23 tons per hour.

** This uncontrolled emission factor from AP-42, Table 11.8-2 (originally 15 lbs PM/ton) was modified to account for 90% capture efficiency

*** This represents the uncontrolled emission factor of fugitives emissions (10% *15)

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC rule 3745-17-03(B)(10).
 - b. Emission Limitation:
20% opacity, except as provided by rule

Applicable Compliance Method:
The permittee shall demonstrate compliance with the opacity limitation based upon the monitoring/recordkeeping and reporting requirements established in sections A.III. and A.IV.2 of the terms and conditions of this permit.

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and

the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. Miscellaneous Requirements

1. The permittee shall perform the following:
 - a. to verify the accuracy of the AP-42 emission factor indicated in section V above, the permittee shall, after issuance of this permit, perform a mass balance demonstration of uncontrolled PM emissions from this emissions unit on the first full cycle of baghouse collection (i.e. from one recovered material removal event to the next); and
 - b. the permittee shall report the above results to Ohio EPA within 10 days of completion.

The permittee may propose an alternative demonstration of verification within 30 days of permit issuance.

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Facility ID: 0374010077 Emissions Unit ID: P003 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
banbury rubber mixer - mixer # 3A (with baghouse that exhausts inside building)		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0374010077 Emissions Unit ID: P004 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
banbury rubber mixer - mixer # 2 (with baghouse that exhausts inside building)	OAC rule 3745-17-11	7.87 lbs particulate matter (PM) per hr
	OAC rule 3745-17-07(A)(1-3)	20% opacity, except as provided by rule

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

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V. **Testing Requirements**

1. Compliance with the emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
7.87 lbs PM /hr

Applicable Compliance Method:

To determine the actual maximum particulate rate (E), the permittee shall use the following equation:

$$E = \text{maximum process throughput* in tons per hour} \times [(EF \times (1-CE))+1.5^{***}]$$

E = particulate matter emissions rate (lbs/hr)

EF = 13.5 lb PM/ton**

CE = control efficiency of the control system (assumed to be 95 percent).

* Based on the Title V application, the maximum process throughput is 4.23 tons per hour.

** This uncontrolled emission factor from AP-42, Table 11.8-2 (originally 15 lbs PM/ton) was modified to account for 90% capture efficiency

*** This represents the uncontrolled emission factor of fugitives emissions (10% *15)

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC rule 3745-17-03(B)(10).

- b. Emission Limitation:
20% opacity, except as provided by rule

Applicable Compliance Method:

The permittee shall demonstrate compliance with the opacity limitation based upon the monitoring/recordkeeping and reporting requirements established in sections A.III. and A.IV.2 of the terms and conditions of this permit.

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. The permittee shall perform the following:
 - a. to verify the accuracy of the AP-42 emission factor indicated in section V above, the permittee shall, after issuance of this permit, perform a mass balance demonstration of uncontrolled PM emissions from this emissions unit on the first full cycle of baghouse collection (i.e. from one recovered material removal event to the next); and
 - b. the permittee shall report the above results to Ohio EPA within 10 days of completion.

The permittee may propose an alternative demonstration of verification within 30 days of permit issuance.

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Facility ID: 0374010077 Emissions Unit ID: P004 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall

not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
banbury rubber mixer - mixer # 2 (with baghouse that exhausts inside building)		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0374010077 Emissions Unit ID: R001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
cove base painter - mainline #1	OAC rule 3745-31-02(A)(2) PTI # 03-9190 OAC rule 3745-17-11 OAC rule 3745-17-07	See A.I.2.a. 0.551 lb PM per hr 20% opacity, except

OAC rule 3745-21-07(G) as provided by rule
None, see A.II.1.

2. **Additional Terms and Conditions**

- a. The combined volatile organic compound (VOC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 234 tons/year based upon a rolling, 365-day summation of the daily emissions.

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II. **Operational Restrictions**

1. This emissions unit shall not employ coatings which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the coating materials after any in-plant reducing or thinning and prior to application of the product.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. documentation on whether or not each coating is a photochemically reactive material;
 - d. the VOC content (excluding acetone) of each coating, in pounds per gallon, as applied;
 - e. the VOC emissions from each coating (A.III.1.b x A.III.1.d), in pounds.
 - f. the total VOC emissions from all coatings, in pounds; and
 - g. the rolling, 365-day VOC emission rate, in tons. The rolling, 365-day VOC emission rate shall be determined in accordance with the following equation:

$$\text{VOC emissions (tons)/rolling, 365-day period} = \text{sum of VOC emissions from the preceding 364 calendar days (tons)} + \text{the VOC emissions from the current day (tons)}$$
2. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day VOC limitation of 234 tons/year.
2. The permittee shall submit annual reports which specify the combined total VOC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. 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 water curtain was not in service when the emissions unit was in operation. 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 after the event occurs.
4. The deviation reports shall be submitted as specified in General Condition A.1.c of this permit.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

 Emission Limitation:

 234 tons VOC/rolling, 365-day period

 Applicable Compliance Method:
 The record keeping requirements in section A.III.1 of this permit shall be used to determine compliance with the above limit.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

- a. Emission Limitation:
0.551 lb PM per hr

Applicable Compliance Method:
To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

E = particulate matter emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (50% considering 40 CFR 60.393)

CE = control efficiency of the control equipment (assumed to be 97%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

Emission Limitation:
20% opacity, except as provided by rule

Applicable Compliance Method:
OAC 3745-17-03(B)(1)

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0374010077 Emissions Unit ID: R001 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
cove base painter - mainline #1	OAC rule 3745-31-02(A)(2) PTI # 03-9190	See B.I.2.a.

2. **Additional Terms and Conditions**

- a. The combined organic compound (OC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 289 tons/year based upon a rolling, 365-day summation of the daily emissions.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the OC content (including acetone) of each coating, in pounds per gallon, as applied;
 - b. the OC emissions from each coating (A.III.1.b x B.III.1.a), in pounds.
 - c. the total OC emissions from all coatings, in pounds; and
 - d. the rolling, 365-day OC emission rate, in tons. The rolling, 365-day OC emission rate shall be determined in accordance with the following equation:

OC emissions (tons)/rolling, 365-day period = sum of OC emissions from the preceding 364 calendar days (tons) + the OC emissions from the current day (tons)

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day OC limitation of 289 tons/year.
2. The permittee shall submit annual reports which specify the total combined OC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:

289 tons OC/rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements in section B.III.1 of this permit shall be used to determine compliance with the above limit.

Any determination of the OC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "OC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0374010077 Emissions Unit ID: R003 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
corner piece cove base painter	OAC rule 3745-31-02(A)(2) PTI # 03-9190	See A.I.2.a.
	OAC rule 3745-17-11	0.551 lb PM per hr
	OAC rule 3745-17-07	20% opacity, except as provided by rule
	OAC rule 3745-21-07(G)	None, see A.II.1.

2. Additional Terms and Conditions

- a. The combined volatile organic compound (VOC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 234 tons/year based upon a rolling, 365-day summation of the daily emissions.

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II. Operational Restrictions

1. This emissions unit shall not employ coatings which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the coating materials after any in-plant reducing or thinning and prior to application of the product.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. documentation on whether or not each coating is a photochemically reactive material;
 - d. the VOC content (excluding acetone) of each coating, in pounds per gallon, as applied;
 - e. the VOC emissions from each coating (A.III.1.b x A.III.1.d), in pounds.
 - f. the total VOC emissions from all coatings, in pounds; and
 - g. the rolling, 365-day VOC emission rate, in tons. The rolling, 365-day VOC emission rate shall be determined in accordance with the following equation:

$$\text{VOC emissions (tons)/rolling, 365-day period} = \text{sum of VOC emissions from the preceding 364 calendar days (tons) + the VOC emissions from the current day (tons)}$$
2. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day VOC limitation of 234 tons/year.
2. The permittee shall submit annual reports which specify the combined total VOC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. 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 water curtain was not in service when the emissions unit was in operation. 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 after the event occurs.
4. The deviation reports shall be submitted as specified in General Condition A.1.c of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

234 tons VOC/rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements in section A.III.1 of this permit shall be used to determine compliance with the above limit.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

- a. Emission Limitation:
0.551 lb PM per hr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (50% considering 40 CFR 60.393)

CE = control efficiency of the control equipment (assumed to be 97%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

Emission Limitation:

20% opacity, except as provided by rule

Applicable Compliance Method:

OAC 3745-17-03(B)(1)

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0374010077 Emissions Unit ID: R003 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
corner piece cove base painter	OAC rule 3745-31-02(A)(2) PTI # 03-9190	See B.I.2.a.

2. Additional Terms and Conditions

- a. The combined organic compound (OC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 289 tons/year based upon a rolling, 365-day summation of the daily emissions.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the OC content (including acetone) of each coating, in pounds per gallon, as applied;
 - b. the OC emissions from each coating (A.III.1.b x B.III.1.a), in pounds.
 - c. the total OC emissions from all coatings, in pounds; and
 - d. the rolling, 365-day OC emission rate, in tons. The rolling, 365-day OC emission rate shall be determined in accordance with the following equation:

$$\text{OC emissions (tons)/rolling, 365-day period} = \frac{\text{sum of OC emissions from the preceding 364 calendar days (tons)} + \text{the OC emissions from the current day (tons)}}{365}$$

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day OC limitation of 289 tons/year.
2. The permittee shall submit annual reports which specify the total combined OC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:

289 tons OC/rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements in section B.III.1 of this permit shall be used to determine compliance with the above limit.

Any determination of the OC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of the coating/cleanup material

by Reference Method 24 or an equivalent or alternative method.

* "OC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0374010077 Emissions Unit ID: R004 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
cove base painter - mainline # 2	OAC rule 3745-31-02(A)(2)	See A.I.2.a.
	PTI # 03-9190	
	OAC rule 3745-17-11	0.551 lb PM per hr
	OAC rule 3745-17-07	20% opacity, except as provided by rule
	OAC rule 3745-21-07(G)	None, see A.II.1.

2. **Additional Terms and Conditions**

- a. The combined volatile organic compound (VOC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 234 tons/year based upon a rolling, 365-day summation of the daily emissions.

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II. **Operational Restrictions**

1. This emissions unit shall not employ coatings which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the coating materials after any in-plant reducing or thinning and prior to application of the product.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. documentation on whether or not each coating is a photochemically reactive material;
 - d. the VOC content (excluding acetone) of each coating, in pounds per gallon, as applied;

- e. the VOC emissions from each coating (A.III.1.b x A.III.1.d), in pounds.
 - f. the total VOC emissions from all coatings, in pounds; and
 - g. the rolling, 365-day VOC emission rate, in tons. The rolling, 365-day VOC emission rate shall be determined in accordance with the following equation:

$$\text{VOC emissions (tons)/rolling, 365-day period} = \text{sum of VOC emissions from the preceding 364 calendar days (tons)} + \text{the VOC emissions from the current day (tons)}$$
2. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day VOC limitation of 234 tons/year.
2. The permittee shall submit annual reports which specify the combined total VOC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. 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 water curtain was not in service when the emissions unit was in operation. 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 after the event occurs.
4. The deviation reports shall be submitted as specified in General Condition A.1.c of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

234 tons VOC/rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements in section A.III.1 of this permit shall be used to determine compliance with the above limit.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

- a. Emission Limitation:
0.551 lb PM per hr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (50% considering 40 CFR 60.393)

CE = control efficiency of the control equipment (assumed to be 97%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

Emission Limitation:

20% opacity, except as provided by rule

Applicable Compliance Method:

OAC 3745-17-03(B)(1)

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0374010077 Emissions Unit ID: R004 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
cove base painter - mainline # 2	OAC rule 3745-31-02(A)(2) PTI # 03-9190	See B.I.2.a.

2. **Additional Terms and Conditions**

- a. The combined organic compound (OC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 289 tons/year based upon a rolling, 365-day summation of the daily emissions.

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II. **Operational Restrictions**

- 1. None

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

- 1. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the OC content (including acetone) of each coating, in pounds per gallon, as applied;
 - b. the OC emissions from each coating (A.III.1.b x B.III.1.a), in pounds.
 - c. the total OC emissions from all coatings, in pounds; and
 - d. the rolling, 365-day OC emission rate, in tons. The rolling, 365-day OC emission rate shall be determined in accordance with the following equation:

 OC emissions (tons)/rolling, 365-day period = sum of OC emissions from the preceding 364 calendar days (tons) + the OC emissions from the current day (tons)

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IV. **Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day OC limitation of 289 tons/year.
- 2. The permittee shall submit annual reports which specify the total combined OC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:

289 tons OC/rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements in section B.III.1 of this permit shall be used to determine compliance with the above limit.

Any determination of the OC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "OC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0374010077 Emissions Unit ID: R005 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
concre coating line #1	OAC rule 3745-31-05	51 lbs VOC per hr (see A.I.2.b.)
		88 tons VOC per year based upon a rolling, 365-day summation of the daily emissions
		See A.I.2.a.
	OAC 3745-17-11	0.551 lb PM per hr
	OAC 3745-17-07	20% opacity, except as provided by rule
	OAC rule 3745-21-07(G)	none (see A.II.1)

2. **Additional Terms and Conditions**

- a. The combined volatile organic compound (VOC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 234 tons/year based upon a rolling, 365-day summation of the daily emissions.

- b. The 51 lbs VOC/hr limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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II. Operational Restrictions

1. This emissions unit shall not employ coatings which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the coating materials after any in-plant reducing or thinning and prior to application of the product.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records and calculations which list the following information for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. documentation on whether or not each coating employed is a photochemically reactive material;
 - d. the VOC content (excluding acetone) of each coating, in pounds per gallon, as applied;
 - e. the VOC emissions from each coating (A.III.1.b x A.III.1.d), in pounds.
 - f. the total VOC emissions from all coatings, in pounds;
 - g. the rolling, 365-day VOC emission rate, in tons. The rolling, 365-day VOC emission rate shall be determined in accordance with the following equation:

VOC emissions (tons)/rolling, 365-day period = sum of VOC emissions from the preceding 364 calendar days (tons) + the VOC emissions from the current day (tons)
2. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. documentation on whether or not each coating is a photochemically reactive material;
 - d. the VOC content (excluding acetone) of each coating, in pounds per gallon, as applied;
 - e. the VOC emissions from each coating (A.III.1.b x A.III.1.d), in pounds;
 - f. the total VOC emissions from all coatings, in pounds; and
 - g. the rolling, 365-day VOC emission rate, in tons. The rolling, 365-day VOC emission rate shall be determined in accordance with the following equation:

VOC emissions (tons)/rolling, 365-day period = sum of VOC emissions from the preceding 364 calendar days (tons) + the VOC emissions from the current day (tons)

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day VOC limitation of 234 tons/year (combined total for R001, R003, R004, and R005), the rolling, 365-day VOC limitation of 88 tons/year, and the hourly VOC limitation of 51 lbs.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit annual reports which specify the combined total VOC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted as specified in General Condition A.1.c of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.551 lb PM per hr

Applicable Compliance Method:
To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

E = particulate matter emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (50% considering 40 CFR 60.393)

CE = control efficiency of the control equipment (assumed to be 97%)

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC rule 3745-17-03(B)(10).
 - b. Emission Limitation:
20% opacity, except as provided by rule

Applicable Compliance Method:
OAC 3745-17-03(B)(1)
 - c. Emission Limitations:

51 lbs VOC/hr
88 tons VOC/rolling, 365-day period
234 tons VOC/rolling, 365-day period (combined total for R001, R003, R004, and R005)

Applicable Compliance Method:
The record keeping requirements in section A.III of this permit shall be used to determine compliance with the above limit.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0374010077 Emissions Unit ID: R005 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall

not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
concrete coating line #1	OAC rule 3745-31-05	63 lbs OC per hr (see B.I.2.b.) 108.6 tons OC per year based upon a rolling, 365-day summation of the daily emissions See B.I.2.a.
2. Additional Terms and Conditions		
a. The combined organic compound (OC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 289 tons/year based upon a rolling, 365-day summation of the daily emissions.		
b. The 63 lbs OC/hr limitation reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.		

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II. Operational Restrictions

1. This permit allows for the use of the coating materials specified by the permittee in the application for PTI number 03-9190. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation specified in this permit was established in accordance with Ohio EPA's "Air Toxics Policy" and is based on the coating formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for toluene based on the Screen3 model and a comparison of the predicted 1-hour maximum ground level concentration to the maximum allowable ground level concentration ("MAGLC"). The following summarizes the results of the modeling for toluene:

Pollutant: toluene
 TLV (microgram/m³): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 10
 Predicted 1-Hour Max. Concentration (microgram/m³): 1917
 MAGLC (microgram/m³): 4476

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 03-9190 and the operating permit:

- a. any changes in the composition of the coatings or the use of new coatings 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 TLV value specified in the above table.
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of the MAGLC specified in the above table.
- c. a reduction in the TLV by the ACGIH for any of the coatings that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.
- d. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records and calculations which list the following information for this emissions unit:
 - a. the OC content (includes acetone) of each coating, in pounds per gallon, as applied;
 - b. the OC emissions from each coating (A.III.1.b x B.III.1.a), in pounds.
 - c. the total OC emissions from all coatings, in pounds;
 - d. the rolling, 365-day OC emissions rate, in tons. The rolling, 365-day OC emissions rate shall be determined in accordance with the following equation:

$$\text{OC emissions (tons)/rolling, 365-day period} = \text{sum of OC emissions from the preceding 364 calendar days (tons)} + \text{the OC emissions from the current day (tons)}$$
2. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the OC content (including acetone) of each coating, in pounds per gallon, as applied;

- b. the OC emissions from each coating (A.III.2.b x B.III.2.a), in pounds.
- c. the total OC emissions from all coatings, in pounds;
- d. the rolling, 365-day OC emission rate, in tons. The rolling, 365-day OC emission rate shall be determined in accordance with the following equation:
- $$\text{OC emissions (tons)/rolling, 365-day period} = \text{sum of OC emissions from the preceding 364 calendar days (tons) + the OC emissions from the current day (tons)}$$

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day OC limitation of 289 tons/year (combined total for R001, R003, R004, and R005), the rolling, 365-day OC limitation of 108.6 tons/year, and the hourly OC limitation of 63 lbs.
2. The permittee shall submit annual reports which summarize the total OC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit annual reports which summarize the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:

63 lbs OC/hr
 108.6 tons OC/rolling, 365-day period
 289 tons OC/rolling, 365-day period (combined total for R001, R003, R004, and R005)

Applicable Compliance Method:

The record keeping requirements in section B.III of this permit shall be used to determine compliance with the above limits.

Any determination of the OC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "OC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

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VI. Miscellaneous Requirements

1. PTI # 03-9190 allows the permittee to operate this emissions unit without employing add-on controls contingent upon the permittee being able to, within 24 months from the effective date of the PTI (i.e., by July 3, 1998), demonstrate that it would not be cost-effective to employ control equipment to control the VOC emissions. (The permittee will be reducing the VOC emissions from this emissions unit by converting to coating formulations that have lower VOC contents.) Therefore, by July 31, 1998, the permittee shall submit a revised BAT study indicating whether or not it is cost-effective to employ add-on control equipment. If the revised BAT study shows that it is economically feasible (i.e., cost-effective) to employ add-on control equipment, the permittee shall complete the installation of the control equipment by no later than 30 months from the effective date of PTI 30-9190 (i.e., by January 31, 1999).

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Facility ID: 0374010077 Emissions Unit ID: Z026 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Concur Coating Line #1 (Z026 will be changed to R005)	OAC rule 3745-31-05	51 lbs per hr VOC (see A.I.2.b.)
	PTI # 03-9190	88 tons per rolling 365-day period VOC
		See A.I.2.a.
	OAC rule 3745-17-11	0.551 lb per hr PM
	OAC rule 3745-17-07(A)(1-3)	20% opacity, except as provided by rule
	OAC rule 3745-21-07(G)	None, see A.II.1.

2. Additional Terms and Conditions

- a. The combined volatile organic compound (VOC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 234 tons/year based upon a rolling, 365-day summation of the daily emissions.
- b. The 51 lbs VOC/hr limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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II. Operational Restrictions

1. This emissions unit shall not employ coatings which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the coating materials after any in-plant reducing or thinning and prior to application of the product.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. documentation on whether or not each coating is a photochemically reactive material;
 - d. the VOC content (excluding acetone) of each coating, in pounds per gallon, as applied;
 - e. the VOC emissions from each coating (A.III.1.b x A.III.1.d), in pounds.
 - f. the total VOC emissions from all coatings, in pounds; and
 - g. the rolling, 365-day VOC emission rate, in tons. The rolling, 365-day VOC emission rate shall be determined in accordance with the following equation:

$$\text{VOC emissions (tons)/rolling, 365-day period} = \frac{\text{sum of VOC emissions from the preceding 364 calendar days (tons)} + \text{the VOC emissions from the current day (tons)}}{365}$$
2. The permittee shall maintain daily records and calculations which list the following information for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. documentation on whether or not each coating is a photochemically reactive material;

- d. the VOC content (excluding acetone) of each coating, in pounds per gallon, as applied;
 - e. the VOC emissions from each coating (A.III.1.b x A.III.1.d), in pounds.
 - f. the total VOC emissions from all coatings, in pounds; and
 - g. the rolling, 365-day VOC emission rate, in tons. The rolling, 365-day VOC emission rate shall be determined in accordance with the following equation:

$$\text{VOC emissions (tons)/rolling, 365-day period} = \text{sum of VOC emissions from the preceding 364 calendar days (tons) + the VOC emissions from the current day (tons)}$$
3. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day VOC limitation of 234 tons/year and the rolling, 365-day VOC limitation of 88 tons/year.
2. The permittee shall submit annual reports which specify the combined total VOC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The deviation reports shall be submitted as specified in General Condition A.1.c of this permit.
4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. 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 water curtain was not in service when the emissions unit was in operation. 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 after the event occurs.

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V. Testing Requirements

- a. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.

Emission Limitations:

51 lbs VOC/hr
 88 tons VOC/rolling, 365-day period
 234 tons VOC/rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements in section A.III.1 of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

- b. Emission Limitation:
 0.551 lb PM per hr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (50% considering 40 CFR 60.393)

CE = control efficiency of the control equipment (assumed to be 97%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:
20% opacity, except as provided by rule

- Applicable Compliance Method:
OAC 3745-17-03(B)(1)

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0374010077 Emissions Unit ID: Z026 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Concur Coating Line #1 (Z026 will be changed to R005)	OAC rule 3745-31-05 PTI # 03-9190	63 lbs OC/hr (see B.I.2.b.) 108.6 tons OC/year, based upon a rolling, 365-day summation of the daily emissions See B.I.2.a.

2. **Additional Terms and Conditions**

- a. The combined organic compound (OC) emissions from emissions units R001, R003, R004, and R005 shall not exceed 289 tons/year based upon a rolling, 365-day summation of the daily emissions.
- b. The 63 lbs OC/hr limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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II. **Operational Restrictions**

- 1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 10
 Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1,917

MAGLC (ug/m3): 4,476

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
2. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall maintain daily records and calculations which list the following information for this emissions unit:
 - a. the OC content (including acetone) of each coating, in pounds per gallon, as applied;
 - b. the OC emissions from each coating (A.III.1.b x B.III.1.a), in pounds;
 - c. the total OC emissions from all coatings, in pounds; and
 - d. the rolling, 365-day OC emission rate, in tons. The rolling, 365-day OC emission rate shall be determined in accordance with the following equation:

$$\text{OC emissions (tons)/rolling, 365-day period} = \text{sum of OC emissions from the preceding 364 calendar days (tons)} + \text{the OC emissions from the current day (tons)}$$
2. The permittee shall maintain daily records and calculations which list the following information for emissions units R001, R003, R004, and R005 combined:
 - a. the OC content (including acetone) of each coating, in pounds per gallon, as applied;
 - b. the OC emissions from each coating (A.III.2.b x B.III.2.a), in pounds;
 - c. the total OC emissions from all coatings, in pounds; and
 - d. the rolling, 365-day OC emission rate, in tons. The rolling, 365-day OC emission rate shall be determined in accordance with the following equation:

$$\text{OC emissions (tons)/rolling, 365-day period} = \text{sum of OC emissions from the preceding 364 calendar days (tons)} + \text{the OC emissions from the current day (tons)}$$
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 365-day OC limitation of 289 tons/year and the rolling, 365-day OC limitation of 108.6 tons/year.
2. The permittee shall submit annual reports which specify the combined total OC emissions from emissions units R001, R003, R004, and R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

- a. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 1. Emission Limitations:
63 lbs OC/hr
108.6 tons OC/rolling, 365-day period
289 tons OC/rolling, 365-day period

Applicable Compliance Method:
The record keeping requirements in sectionB.III. of this permit shall be used to determine compliance with the above limits.

Any determination of the OC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "OC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

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VI. **Miscellaneous Requirements**

1. None