

Facility ID: 0448011516 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 0448011516 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint Spray Booth	OAC rule 3745-31-05(A) (PTI 04-01062 issued 5/3/2007)	Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
		Particulate emissions (PE) shall not exceed 1.58 tons per year. see Section A.2.a
	OAC rule 3745-31-05(C) (PTI 04-01062 issued 5/3/2007)	VOC emissions shall not exceed 22.3 tons per year as a rolling, 12-month summation of the monthly emissions.
		Emissions of any individual hazardous air pollutant (HAP) shall not exceed 1.6 pounds per gallon of coating and 10 tons per year as a rolling, 12-month summation of the monthly emissions.
OAC rule 3745-17-07(A)	OAC rule 3745-17-11(B)(1) OAC rule 3745-21-09(U)(1)	Emissions of any combination of HAP shall not exceed 21.0 tons per year as a rolling, 12-month summation of the monthly emissions. see Section 2.c
		Visible emissions shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
		PE shall not exceed 0.551 pound per hour. see Section A.2.d

2. Additional Terms and Conditions

- (a) The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).
The permittee shall not use cleanup materials containing HAP.
The potential emissions [as defined by OAC 3745-77-01(BB)] of hazardous air pollutants (HAPs) from all emission units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 TPY for any single HAP and 25 TPY for any combination of HAPs.
The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 12,000 gallons per year, based upon a rolling, 12-month summation of the monthly coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

. Maximum Allowable

. Month(s) Cumulative Coating Usage

- . 1 1,000
- . 1-2 2,000
- . 1-3 3,000
- . 1-4 4,000
- . 1-5 5,000
- . 1-6 6,000
- . 1-7 7,000
- . 1-8 8,000
- . 1-9 9,000
- . 1-10 10,000
- . 1-11 11,000
- . 1-12 12,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage figures.

2. The maximum annual usage of photochemically reactive cleanup materials shall not exceed 2,600 pounds per year, based upon a rolling, 12-month summation of the monthly cleanup materials usage figures.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents) in pounds per gallon of coating, as applied;
 - c. the individual HAP content of each coating in pounds per gallon of coating, as applied;
 - d. the total combined HAP content of each coating in pounds per gallon of coating, as applied;
 - e. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - f. the name and identification number of each cleanup material employed;
 - g. the VOC content of each cleanup material, in pounds per gallon;
 - h. the OC content of each cleanup material, in pounds per gallon;
 - i. the number of gallons of each cleanup material employed;
 - j. the weight of each cleanup material employed, in pounds;
 - k. the individual HAP content of each cleanup material in pounds per gallon;
 - l. the total combined HAP content of each cleanup material in pounds per gallon of cleanup material (the sum of the individual HAP contents from (k));
 - m. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [the summation of (b x e) + (g x i) for all coatings and cleanup materials employed];
 - n. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons [the summation of (b x e) + (h x i) for all coatings and cleanup materials employed];
 - o. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of (c) times (e) for each coating plus the sum of (k) times (i) for each cleanup material).
 - p. The total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of (d) times (e) for each coating plus the sum of (l) times (i) for each cleanup material).
 - q. the rolling, 12-month summation of the coating usage, in gallons; and
 - r. the rolling, 12-month summation of the usage of cleanup materials containing VOC, in pounds.

(The above-mentioned information must be maintained separately for the line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services (TES) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to TES within 30 days following the end of the calendar month.
2. The permittee shall notify the TES of any monthly record showing any deviation from the following:
- a. An identification of all months during which the Hazardous Air Pollutant (HAP) content limitation(s) were exceeded (pound of individual HAP per gallon of coating or pound of VOC per gallon of coating limitations);
 - b. The total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in tons per year per rolling 12 month period;
 - c. The total combined HAP emissions limitation from all coatings and cleanup materials employed, in tons per year per rolling 12 month period;

- d. Exceedances of the 12,000 gallons of coating per rolling, 12-month period limitation and, for the first 12 calendar months of operation, exceedances of the maximum allowable cumulative coating usage levels;
- e. Exceedances of the 2,600 pounds of photochemically reactive cleanup materials per rolling, 12-month period limitation.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit these reports within 15 days of the discovery of the exceedance. If no exceedance reports have been submitted in the calendar year, the permittee shall submit a statement verifying that no exceedances have occurred during the calendar year. This annual report shall be submitted by January 31 of each year.

- 3. The permittee shall notify TES in writing of any monthly record showing the use of cleanup materials containing HAP. The notification shall include a copy of such record and shall be sent to TES within 30 days following the end of the calendar month.
- 4. The permittee shall also submit annual Synthetic Minor Title V Fee Emissions Reports that specify the total OC and VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year.

E. Testing Requirements

- 1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

VOC emissions shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to demonstrate compliance. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

PE shall not exceed 1.58 tons per year.

Applicable Compliance Method:

A one-time calculation of the potential to emit based on the following information: maximum coating usage of 12,000 gallons per year; maximum paint density of 8.77 pounds per gallon; maximum solids content of 60%; estimated transfer efficiency of 50%, and estimated dry filtration control efficiency of 90%.

$12,000 \text{ gal/yr} \times 8.77 \text{ lb/gal} \times 0.6 \times 0.5 \times 0.1 \times \text{ton}/2000 \text{ lb} = 1.58 \text{ tons/yr PE}$

Emission Limitation:

PE shall not exceed 0.551 pound per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to OAC rule 3745-17-03(B)(10).

Emission Limitation:

VOC emissions shall not exceed 22.3 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The Monitoring and Recordkeeping Requirements shall serve as demonstration of compliance with this emission limitation.

This emission limitation was established by adding the maximum annual VOC emissions from coating usage (21.0 tons/yr) to the maximum annual emissions from VOC-containing cleanup materials usage (1.3 tons/yr).

Maximum VOC emissions from coating usage:

$12,000 \text{ gallons/yr} \times 3.5 \text{ lbs VOC/gallon} \times \text{ton}/2000 \text{ pounds} = 21.0 \text{ tons/yr VOC}$

Maximum VOC emissions from VOC-containing cleanup materials usage:

$2,600 \text{ lbs/yr} \times \text{ton}/2000 \text{ lb} = 1.3 \text{ tons/yr}$

Emission Limitation:

Visible emissions shall not exceed 20% opacity, unless otherwise specified by the rule.

Applicable Compliance Method:

If required, the methods and procedures outlined under OAC rule 3745-17-03(B)(1) shall be used to demonstrate compliance.

Emission Limitation:

Individual HAP shall not exceed 1.6 pounds per gallon of coating.

Applicable Compliance Method:

The permittee may rely on manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it.

If required, the permittee shall use Method 311(appendix A to 40 CFR part 63) for determining the mass fraction of organic HAP along with the procedure outlined in Section i below to determine the individual HAP content of coating (pounds HAP per gallon).

Emission Limitation:

Individual HAP emissions shall not exceed 10 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The recordkeeping requirements of Section C.1 shall serve as demonstration of compliance with this emission limitation.

Emission Limitation:

Emissions from any combination of HAP shall not exceed 21.0 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The recordkeeping requirements of Section C.1 shall serve as demonstration of compliance with this emission limitation.

Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791). Multiply the density of the coating (pounds per gallon) by the mass fraction of each organic HAP you count to determine the individual HAP content of the coating (pounds HAP per gallon).

F. Miscellaneous Requirements

1. None