

Facility ID: 0448011673 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: 0448011673 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>
K001 - Paint spray booth for metal furniture	OAC rule 3745-31-05(A)(3) (PTI 04-0995, issued 1/4/1996)	Volatile organic compound (VOC) emissions shall not exceed 2.7 tons per year.
		Particulate emissions (PE) shall not exceed 0.33 ton per year.
		See Section II.A.2.a.
	OAC rule 3745-17-07(A)(1)	Visible emissions of fugitive dust shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(I)(3)(a)	Exemption, see Section II.A.2.b.

2. **Additional Terms and Conditions**
 - (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1), and OAC rule 3745-21-09(I)(3)(a). This emissions unit is exempt from the requirements of OAC rule 3745-21-09(I) pursuant to OAC rule 3745-21-09(I)(3)(a). The total VOC emissions from all the prime coat, topcoat, and/or single coating applications from all the facility's metal furniture coating lines shall not exceed 15 pounds per day.

B. Operational Restrictions

1. The permittee shall employ no more than 3,842 liters (1,015 gallons) of coating per year.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all metal furniture coating lines at the facility:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied; and
 - c. the total VOC emissions from the coatings employed, as calculated using the following equation:

$$T = A_1 B_1 + A_2 B_2 + \dots + A_n B_n$$
 where:
 T = total VOC emissions from the combined coating lines before the application of capture systems and control devices, in units of pounds per day;
 n = number of different coatings applied in the coating lines at the facility;

i = subscript denoting an individual coating;

A_i = mass of VOC per volume of coating (i) (excluding water and exempt solvents), as applied, in units of pounds VOC per gallon; and

B_i = volume of coating (i) (excluding water and exempt solvents), as applied, in units of gallons per day.

2. The permittee shall collect and record the following information each month and maintain the information at the facility for a period of 5 years:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material in pounds VOC per gallon;
 - d. the total VOC emissions from all cleanup materials employed during the month.
3. The permittee shall maintain monthly records of the total volume, in gallons, of all VOC-containing materials used or purchased in a calendar year.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the combined VOC emissions (excluding emissions from cleanup materials) from all of the metal furniture coating lines at the facility are equal to or greater than 15 pounds of VOC per day (before add-on controls). The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which include the following information:
 - a. an identification of all days during which the 15 pounds per day limitation for all of the metal furniture coating lines was exceeded;
 - b. the total VOC emissions from the coatings employed in all of the metal furniture coating lines; and
 - c. the total VOC emissions from the cleanup materials employed in all of the metal furniture coating lines.

The reports shall be submitted by February 15 of each year.
3. The permittee shall notify the Toledo Division of Environmental Services in writing of any record showing that the maximum number of gallons of VOC-containing materials per calendar year has been exceeded. The notification shall include a copy of such record and shall be sent to the Toledo Environmental Services within 30 days after the event occurs.
4. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system 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 Toledo Environmental Services within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1. and A.2. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

VOC emissions shall not exceed 2.7 tons per year.

Applicable Compliance Method:

Compliance with the annual tons per year VOC emission limitation is based on multiplying the 15 pound per day maximum allowable emission rate by 365 days per year and dividing by 2,000 pounds per ton.
Emission Limitation:

0.33 ton PE/year

Applicable Compliance Method:

This emission limitation was developed based on a one-time calculation of the worst case operating scenario, as follows: multiply the worst case coating solids content (9.5 pounds solids per gallon) by the maximum allowable VOC emissions from the facility (15 pounds VOC per day) multiplied by one minus the transfer efficiency (50% transfer efficiency for HVLP gun) multiplied by one minus the capture efficiency (90% filter efficiency) multiplied by 365 days per year and divided by the worst case coating VOC content (4 pounds VOC per gallon) divided by 2,000 pounds per ton.
Emission Limitation:

0.551 lb PE/hour

Applicable Compliance Method:

Compliance shall be determined through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).
Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).
Emission Limitation:

Less than 15 pounds of VOC per day.

Applicable Compliance Method:

Compliance with the daily required coating VOC content limitation shall be based upon the recordkeeping requirements specified in C.1.

If required, compliance with the coating VOC content shall be determined through testing performed in accordance with Methods 24 and 24A of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-21-10(B). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

2. Compliance with the annual material usage limitation shall be based upon the recordkeeping requirements specified in C.2.

F. Miscellaneous Requirements

1. None