

Facility ID: 0448020086 Issuance type: Final State Permit To Operate

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

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

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

[Go to Part II for Emissions Unit F001](#)  
[Go to Part II for Emissions Unit K001](#)

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Facility ID: 0448020086 Emissions Unit ID: F001 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>
F001 - sandblasting operation for treatment of miscellaneous metal parts, controlled by full enclosure	OAC rule 3745-31-05(A)(3)	1.8 pounds per hour of particulate emissions (PE)  7.9 tons per year of PE  Visible particulate emissions shall not exceed 5% opacity as a 3-minute average
	OAC rule 3745-17-07(B)(1)	See section 2.a
	OAC rule 3745-17-08(B)(3)	See section 2.b

**2. Additional Terms and Conditions**

- (a) All sandblasting operations will be restricted to an enclosed area. If any mechanical exhaust system is provided for this enclosed area, such equipment shall be operated with an appropriate particulate control device.  
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

1. None

**C. 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.

**D. Reporting Requirements**

1. The permittee shall submit written deviation reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. The reports shall be submitted to the City of Toledo Department of Environmental within 45 days after the exceedance occurs.

**E. Testing Requirements**

1. Emission Limitation;
  - 5% opacity, as a 3-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)(3).
  
2. Emission Limitation:
  - 1.8 pounds per hour of particulate emissions (PE)
  - Applicable Compliance Method;
    - Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed based on a one-time calculation of the worst case operating scenario, as follows: multiply the maximum abrasive usage rate (4 tons per day), 2000 pounds per ton, by the emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 13.2.6-1 dated 9/97 (27 pounds of fugitive particulate emissions per 1000 pounds of abrasive), and an estimated control factor for full enclosure (1-80%) and divide by 24 hours per day.
  
3. Emission Limitation:
  - 7.9 tons per year of PE
  - Applicable Compliance Method;
    - This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.8 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0448020086 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 - spray painting operation for painting miscellaneous metal parts, controlled by full enclosure with a mechanical particulate control device	OAC rule 3745-31-05(A)(3)	2.41 tons per year of PE
		12 pounds per hour of volatile organic compounds (VOC)
		7.3 tons per year of VOC
		The emissions of visible particulate from any stack shall not exceed 5% opacity as a six-minute average.
		See section 2.a and b
	OAC rule 3745-17-07(A)(1)	See section 2.c
	OAC rule 3745-17-11(B)(1)	0.551 pound per hour of particulate emissions (PE)
	OAC rule 3745-21-09(U)(2)(e)(iii)	Exemption: less than or equal to 10.0 gallons of

coating on any given day

2. **Additional Terms and Conditions**

- (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-17-11(B)(1). All spray painting operations will be restricted to an enclosed area. A mechanical exhaust system shall be provided for this enclosed area, and such equipment shall be operated with an appropriate particulate control device. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. **Operational Restrictions**

1. The permittee shall employ no more than 10 gallons of coating in any day.

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

1. The permittee shall collect and record the following information daily for the coating line:
- The name and identification number of each coating employed.
  - The volume, in gallons, of each coating employed.
  - The total volume, in gallons, of all the coatings employed.
2. The permittee shall perform monthly 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:
- the color of the emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

D. **Reporting Requirements**

1. The permittee shall notify the City of Toledo Department of Environmental Services in writing of any monthly record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the City of Toledo Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the City of Toledo Department of Environmental Services in writing of any monthly record that (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. The notification shall include a copy of such record and shall be sent to the City of Toledo Department of Environmental Services within 45 days after the exceedance occurs.

E. **Testing Requirements**

1. Emission Limitation;
- 5% opacity, as a six-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).
2. Emission Limitation:
- Particulate emissions shall not exceed 0.551 lb/hr
- Applicable Compliance Method:
- To determine the actual worst case particulate emission rate, the following equation shall be used:
- $$E = (M) * (1-TE) * (1-CE)$$
- where:
- E = particulate emission rate (lbs/hr)
- M = maximum coating solids usage rate (lbs/hr)
- 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
- CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.
- If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).
3. Emission Limitation:
- 2.41 tons per year of PE

## Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.551 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

## 4. Emission Limitation:

12 pounds per hour of VOC

## Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed based on a one-time calculation of the worst case operating scenario, as follows: multiply the maximum coating usage rate (3 gallons per hour) by the maximum VOC content of the coating (4.0 pounds VOC per gallon).

## 5. Emission Limitation:

7.3 tons per year of VOC

## Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the maximum coating usage rate (10 gallons per day), by the maximum VOC content of the coating (4.0 pounds VOC per gallon), by 365 days per year and divide by 2,000 pounds per ton.

F. **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.