Facility ID: 0575010020 Issuance type: Final State Permit To Operate

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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: 0575010020 Emissions Unit ID: K002 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Paint Booth #2 - metal and non-metal parts coating with drying oven	OAC rule 3745-31-05(A)(3) PTI 05-10368	The Volatile Organic Compound (VOC) emissions from the coating materials employed in this emissions unit, when coating metal parts, shall not exceed shall not exceed 62.4 lbs/day. The total VOC emissions from this emissions unit, including cleanup, shall not exceed 11.6 tons per 12-month rolling period. Coating usage in this emissions unit shall not exceed ten gallons per day. The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2), when coating non-metal parts. See Section A.2.b
	OAC rule 3745-21-09(U)(2)(e)(iii)	The requirement established pursuant to this rule is less stringent than the requirement of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	Organic Compound emissions shall not exceed 8 lbs/hour and 40 lbs/day, including cleanup, when coating non-metal parts.
	OAC rule 3745-35-07(B)	See Section A.2.b

2. **Additional Terms and Conditions**

   (a) The 62.4 pounds of volatile organic compounds per day emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
   The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility shall not exceed 10.0 TPY* for any single HAP and 25.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

   * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. **Operational Restrictions**

1. The combined usage Wash Primer Catalyst Reducer, Product Number R7K44, at this facility shall not exceed 4,000 gallons per year, based upon a rolling, 12-month summation.

   This facility-wide rolling, 12-month Wash Primer Catalyst Reducer usage limitation ensures that the emissions of any individual HAP will not exceed the major source threshold of 10 TPY, and ensures that the emissions of combined HAPs will not exceed the major source threshold of 25 TPY.

Given that the permittee has maintained records of the monthly Wash Primer Reducer usage, compliance with the rolling, 12-month summation, shall begin immediately upon issuance of this permit.

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

1. The permittee shall collect and record the following information each day for this emissions unit:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information for each day for this emissions unit when coating non-metal parts:

   a. The company identification for each coating and photochemically reactive cleanup material employed;

   b. The number of gallons of each coating and photochemically reactive cleanup material employed;

   c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

   d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

   e. The total number of hours the emissions unit was in operation; and

   f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions for this emissions unit:

   a. The name and identification of each cleanup material employed;

   b. The number of gallons of each cleanup material employed (lost);

   c. The VOC content of each cleanup material, in pounds per gallon;

   d. The VOC content of each coating, as applied, in pounds per gallon; and

   e. The rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

   (note: the VOC emissions from cleanup materials are based upon a 5% solvent loss which is determined by recording materials employed minus materials recovered).

4. The permittee shall maintain monthly records of the following information for the entire facility:

   a. The Wash Primer Catalyst Reducer, Product Number R7K44, usage for each month; and

   b. The rolling, 12-month summation of the Wash Primer Catalyst Reducer, Product Number R7K44, usage rates.

5. The permittee shall collect and record the following information each month for the HAP(s) employed at this facility:
   a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;

   b. the name and identification number of each HAP containing material employed;

   c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;

   d. the amount of each HAP containing material employed, in gallons;

   e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];

   f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];

   g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

   h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

   * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA, Southwest District Office contact. This information does not have to be kept on a line-by-line basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   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 previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. 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 coating line employs more than the applicable maximum daily coating usage limit, 10 gallons. 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 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour when coating non-metal parts, and the actual average hourly organic compound emissions for each such day; and

   b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day when coating non-metal parts, and the actual organic compound emissions for each such day.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2)

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following limitations for the entire facility:

   a. the rolling, 12-month Wash Primer Catalyst Reducer, Product Number R7K44, usage limitation; and

   b. the rolling, 12-month individual HAP emission limitation.

   c. the rolling, 12-month combined HAP emission limitation.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit under Section (A)(2).

E. **Testing Requirements**

1. Emission Limitation -

   Maximum daily volume coating usage shall not exceed 10 gallons

   Applicable Compliance Method -

   Compliance shall be based upon the record keeping as specified in Section C.1

2. Emission Limitation -

   8 pounds organic compounds per hour, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content;

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed; and

c. divide the total daily organic compound emissions, as determined in (b), by the number of hours operated for each day.

Compliance shall also be based upon the record keeping as specified in Section C.2.

3. Emission Limitation -

40 pounds organic compounds per day, when coating non-metal parts

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the daily number of gallons of each coating and photochemically reactive cleanup material employed by its respective organic compound content; and

b. sum the daily organic compound emissions from each coating and photochemically reactive cleanup material employed.

Compliance shall also be based upon the record keeping as specified in Section C.2.

4. Emission Limitation -

11.6 tons volatile organic compounds as a rolling, 12-month summation for this emissions unit

Applicable Compliance Method -

Compliance shall be determined by the following method:

a. multiply the monthly number of gallons of each coating and cleanup material employed by its respective volatile organic compound content;

b. sum the monthly volatile organic compound emissions from each coating and cleanup material employed; and

c. sum the rolling, 12-month volatile organic compound emissions, as determined in (b), and convert pounds to tons, 1 ton/2000 lbs.

Compliance shall also be based upon the record keeping as specified in Section C.3.

5. Emission Limitation -

The Wash Primer Catalyst Reducer, Product Number R7K44, usage shall not exceed 4,000 gallons for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.4.

6. Emission Limitation -

10.0 tons of any individual Hazardous Air Pollutant for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

7. Emission Limitation -

25.0 tons of combined Hazardous Air Pollutants for the entire facility as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.5.

F. **Miscellaneous Requirements**

1. None