

Facility ID: 0575010235 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: 0575010235 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.

| <u>Operations, Property, and/or Equipment</u>   | <u>Applicable Rules/Requirements</u>       | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|--|--|
| K002 - Miscellaneous metal parts coating line using less than 10 gallons of coating per day | OAC rule 3745-31-05(A)(3) and PTI 05-12755 | 65.7 lbs of volatile organic compounds (VOC)/day, including cleanup<br><br>13.96 tons VOC/yr, including cleanup<br><br>0.551 lb particulate emissions (PE)/hr<br><br>2.41 tons PE/yr<br><br>Visible PE shall not exceed 0% opacity.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (U)(1) and OAC rule 3745-35-07(B). |
|   | OAC rule 3745-17-11(B)                     | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).   |
|   | OAC rule 3745-17-07(A)                     | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).   |
|   | OAC rule 3745-21-09(U)(1)                  | See section A.I.2.a.   |
|   | OAC rule 3745-31-05(C) to Avoid Title V    | See section A.I.2.b.   |

**2. Additional Terms and Conditions**

- (a) OAC rule 3745-21-09(U)(1) does not apply because the permittee has committed to limit this emissions unit to 10 gallons per day as specified in OAC rule 3745-21-09 (U)(2)(e)(iii). To demonstrate that not more than 10 gallons is used in this unit, the permittee shall maintain the record keeping requirements in section C.1.  
The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 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 permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The coating usage in this emissions unit shall not exceed 10 gallons/day.

**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, as applied;
  - b. The number of gallons of each coating employed;
  - c. The total coatings usage, in gallons, from all the coatings [summation of "b" for all coatings];
  - d. The volatile organic compound (VOC) content of each coating and cleanup material employed;
  - e. The VOC emissions of each coating and cleanup material employed, in pounds per day [the product of multiplying usage in "c" by VOC content in "d"]; and
  - f. The total VOC emission rate for all coatings and cleanup materials, in pounds per day [summation of "e" for all coatings and cleanup materials employed].
2. 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.
  3. The permittee shall collect and record the following information each month for the facility:
    - the name and identification number of each coating material employed;
    - the individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating material\* in pounds of individual HAP per gallon of coating, as applied;
    - the total combined HAP content of each coating material in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
    - the number of gallons of each coating material\* employed;
    - the name and identification of each cleanup material employed;
    - the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
    - the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
    - the number of gallons of each cleanup material employed;
    - the total individual HAP usage for each HAP from all coating material and cleanup material employed, in pounds or tons per month [ for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
    - the total individual HAP usage for each HAP from all coating material and cleanup material employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
    - 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 calendar months; and
    - 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 calendar 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.

4. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.365 (0.55 g/s)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 209.1

MAGLC (ug/m3): 4,476

5. 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 still 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.

6. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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**

- The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 45 days after the exceedance occurs.
- The permittee shall notify the Director (the Ohio EPA, Southwest District Office) 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 Director (the Ohio EPA, Southwest District Office) within 30 days after the event occurs.
- The permittee shall submit deviation (excursion) reports which include the following information:
  - an identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day;
  - an identification of each month during which the individual HAP emissions at the facility exceeded 9.9 tons per year, based on a 12-month rolling average; and
  - an identification of each month during which the combined HAP emissions at the facility exceeded 24.9 tons per year, based on a 12-month rolling average.
- The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.1.c of this permit.

**E. Testing Requirements**

- Compliance with the emission limitation in Section A. I. 1. of these terms and conditions shall be determined in accordance with the following method:  
Emission Limitation: no more than 10 gallons of coatings per day

Applicable Compliance Method-

Compliance with the gallon usage restriction above shall be based on the record keeping requirements specified in Section C.1.c of this permit.

Emission Limitations: 55.1 lbs VOC/day, 10.06 tons VOC/yr

Applicable Compliance Method-

Compliance with the daily VOC emission restriction above shall be based on the record keeping requirements specified in Section C.1.f of this permit.

Compliance with the annual allowable VOC emission limitation shall be assumed as long as compliance with the daily VOC limitation is maintained [the annual allowable VOC emission limitation of 13.96 tons represents a value that is greater than the emissions unit's potential to emit of 12 tons/year (the emissions unit's potential to emit was calculated by multiplying the daily allowable emission limitation of 65.7 lbs by 365, and then dividing by 2000)].

Emission Limitations: 0.551 lbs PE/hour, 2.41 TPY PE

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$E = MCSUR \times (1-TE) \times (1-CE)$$

where:

$$E = PE \text{ rate (lbs/hr)} = 0.551 \text{ lbs PE/hour}$$

MCSUR = the maximum coatings 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 required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with OAC rule 3745-17-03(B)(10).

Compliance with the annual allowable PE limitation shall be assumed as long as compliance with the hourly allowable PE limitation is maintained (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000).

Emission Limitations: 9.9 tons of HAP/yr and 24.9 tons of HAP's/yr, as based on a rolling, 12-month summation

Applicable Compliance Method-

Compliance with the HAP and HAP's 12 month rolling emission restrictions above shall be based on the record keeping requirements specified in Section C.3.k. and C.3.l. of this permit, respectively.  
Emission Limitation:

0% Opacity, as a six minute average, from the stack.

Applicable Compliance Method:

If requested, 40 CFR Part 60, Method 9, with opacity readings taken from the stack  
Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A., B., C.1., 2.,3., D. and E.