

Facility ID: 0605010097 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: 0605010097 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 - Adhesive Spray Booth, SPCC001	OAC rule 3745-31-05(A)(3) PTI # 06-08011 Issued 01/31/2006	Organic Compound (OC) emissions, including cleanup material, shall not exceed 54.82 lbs/hr.  There shall be no visible particulate emissions (PE) from the exhaust stack.  See Section A.2.b. below.  PE shall not exceed 0.05 tpy.
	OAC rule 3745-17-11 OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11, OAC rule 3745-35-07(B), and OAC rule 3745-21-07(G)(2). PE shall not exceed 0.77 lb/hr. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See Section A.2.a. below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-35-07(B) (avoiding both Title V and a MACT)	OC emissions from coatings and cleanup shall not exceed 4.17 tons per rolling 12-month period.  See Sections A.2.c and B.2. below.

**2. Additional Terms and Conditions**

- (a) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.  
The best available control technology for the control of PE from this source is to employ a dry filter media system. The dry filter media system shall be employed at all times when the emission unit is in operation.  
Both hazardous air pollutants (HAPs) and volatile organic compound (VOC) emissions are a subset of OC emissions. Therefore, restricting OC emissions to below federal major source trigger levels will result in avoiding Title V for both VOC and HAPs and also avoiding MACT Subpart PPPP.

**B. Operational Restrictions**

1. The amount of OC used in both adhesives and clean-up solvents employed in this emissions unit shall not exceed 4.17 tons per rolling 12-month period calculated using the following formula:

$$[\text{Summation of } (P_i \times OC_i) \text{ for } i=1, n]/2000 \leq 4.17 \text{ tons OC}$$

Where:

- n = total number of different coatings used
- i = coating material "i" (where "i" = 1, 2, ...etc)
- P<sub>i</sub> = Usage of coating material "i" in gallons or pounds;
- OC<sub>i</sub> = OC content of coating material "i" in pounds per gallon\*\* or percent by weight;\*\* (percent by mass weight)

of solvent contained within a gallon of coating material)

\*\*this assumes when using pounds per gallon or percent by weight units, 100% of the organic solvent is emitted.

2. To ensure enforceability during the first 12 calendar months of operation following the startup of emissions unit K001, the permittee shall not exceed the OC usage levels specified in the following table:

Maximum Allowable  
Month(s) OC Usage (Tons)

1 0.35  
1-2 0.70  
1-3 1.05  
1-4 1.40  
1-5 1.75  
1-6 2.10  
1-7 2.45  
1-8 2.80  
1-9 3.15  
1-10 3.50  
1-11 3.85  
1-12 4.17

After the first 12 calendar months of operation following the startup of this emissions unit, compliance with the annual OC usage restriction shall be based upon a rolling, 12-month summation of the monthly usage figures.

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

1. The permittee shall collect and record the following information each day for materials used in the emissions unit:
- The company identification of each coating and cleanup material employed;
  - the total number of gallons, or pounds of each coating and cleanup material employed;
  - the OC content of each coating and cleanup material, in pounds per gallon, excluding water and exempt solvents, or in percent by weight;
  - the total OC emission rate in pounds (the sum of b. times c. for all coatings and cleanup materials employed);
  - the total number of hours the emissions unit was in operation;
  - the calculated average hourly OC emission rate in pounds per hour, based upon the total daily coatings and cleanup materials employed, and the actual hours of operation of the emissions unit, i.e., d./e.; and
  - documentation for each coating and cleanup material as to whether it is or is not a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).
- Note: The cleanup materials employed by this emissions unit are captured and shipped off-site for reclamation. Therefore, for the purpose of tracking emissions, the number of gallons of cleanup material employed is the difference between the gallons of cleanup material received and the gallons of cleanup material shipped off-site.
2. The permittee shall collect and record the following information each month for the line:
- The name and identification number of each coating, and cleanup material employed;
  - the OC content of each coating (excluding water and exempt solvents), and cleanup material, in pounds per gallon or in percent by weight;
  - the number of gallons of each coating, and cleanup material employed;
  - the total OC emissions (OC applied) from all coatings, and cleanup materials employed [the sum of (1.b times 1.c divided by 2000 lb/ton) for all coatings and cleanup materials], in tons;
  - the rolling, 12-month summation of coatings employed, in gallons;
  - the rolling, 12-month summation of cleanup solvent employed, in gallons;
  - the rolling, 12-month summation of total OC\* emissions [sum of (2.b times 2.e and 2.f divided by 2000 lb/ton)], in tons;
  - beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of OC usage. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative OC usage for each calendar month.
3. 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**

1. The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of photochemically reactive coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month.
2. The permittee shall notify the Ohio EPA Southeast 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 Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of
  - a. the rolling 12-month OC usage and OC mass emission limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative OC usage limitation set forth in Section B.1. and B.2. of this permit.
  - b. the hourly organic compound emission rate in Section A.1 from the coatings and cleanup materials, and the actual organic compound emissions for each such hour.
4. These reports are due by the date described in Part 1- General Terms and Conditions.

**E. Testing Requirements**

1. Emission Limitation:
 

OC emissions, including cleanup material, shall not exceed 54.82 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements in section C.1. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.
2. Emission Limitation:
 

There shall be no visible PE from the exhaust stack.

Applicable Compliance Method:

If required, compliance with the visible emissions limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03 (B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to rule 3745-15-04 (A).
3. Emission Limitation:
 

PE shall not exceed 0.77 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

Constants: 1.6 lbs/particulate per gallon of adhesive  
25% transfer efficiency (TE)  
92% filter control efficiency (CE)

$$PE = 1.6\text{lbs/gal}(8\text{ gal/hr})(.75\text{ TE})(.08\text{ CE}) = 0.768$$

$$PE = 0.77\text{ lbs/hr}$$

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).
4. Emission Limitation:
 

OC emissions shall not exceed 4.17 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based on the operational restrictions contained in section B.1. and B.2, and the record keeping required in Section C.1. and C.2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.
5. Emission Limitation:
 

PE shall not exceed 0.05 tpy.

Applicable Compliance Method:

Compliance shall be based upon the formula in term E.3 and the number of gallons employed during the year as recorded in section C.

**F. Miscellaneous Requirements**

1. None