

Facility ID: 0630000007 Issuance type: Title V Final Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

P003 - drying oven;
Z002 - paint mix room, line #4;
Z003 - paint mix room, line #1; and
Z004 - rack oven.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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- [Go to Part III for Emissions Unit P004](#)
- [Go to Part III for Emissions Unit P007](#)
- [Go to Part III for Emissions Unit R006](#)
- [Go to Part III for Emissions Unit R007](#)
- [Go to Part III for Emissions Unit R010](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: P002 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
natural gas-fired, line bake ovens 1A and 1B	OAC rule 3745-31-05(A)(3) (PTI 06-2376)	2.73 tpy of organic compound (OC) emissions for each oven
	OAC rule 3745-21-07(G)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1). OC emissions shall not exceed 3 lbs/hr and 15 lbs/day for each oven.

2. **Additional Terms and Conditions**
 - (a) None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for each oven (1A and 1B):
 - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emission rate for all coatings employed in the coating operations associated with the oven, i.e., the sum of the values from sections A.III.1.f for emissions units R006 and R012 (oven 1A) or R007 and R013 (oven 1B), multiplied by the maximum percentage of the emissions associated with the oven (as defined in sections A.V.2 and A.V.3 of this permit), in pounds per day;
 - b. the total number of hours the oven was in operation (this number should be the same as the number of

hours the associated coating operations were in operation); and

c. the average hourly OC emission rate, i.e., (a)/(b), in pounds per hour (average) for the oven.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for each oven (1A and 1B):
 - a. an identification of each day during which the average hourly OC emissions exceeded 3 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions exceeded 15 lbs/day, and the actual OC emissions for each such day.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall also submit annual reports which specify the total OC emissions from each oven for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

3 lbs/hr of OC and 15 lbs/day of OC for each oven

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section A.III.1. If required, testing to demonstrate compliance with the hourly emission limitation shall be conducted in accordance with Method 25 or 25A of 40 CFR Part 60, Appendix A. No testing is specifically required by this permit.
 - b. Emission Limitation:

2.73 tpy of OC for each oven

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily values specified in section A.III.1.a, and then dividing by 2000 lbs/ton.
2. For purposes of calculating the OC emission rate for oven 1A and the associated spray booths (R006 and R012), the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 22% of the OC employed in the spray booths shall be considered to be the uncontrolled emissions for oven 1A. This "split" of OC emissions between oven 1A and the associated spray booths is based upon a mass balance study conducted by the facility.
3. For purposes of calculating the OC emission rate for oven 1B and the associated spray booths (R007 and R013), the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 22% of the OC employed in the spray booths shall be considered to be the uncontrolled emissions for oven 1B. This "split" of OC emissions between oven 1B and the associated spray booths is based upon a mass balance study conducted by the facility.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 063000007 Emissions Unit ID: P002 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: P004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
natural gas-fired, batch oven #3	OAC rule 3745-31-05(A)(3) (PTI 06-2376)	2.73 tpy of organic compound (OC) emissions
	OAC rule 3745-21-07(G)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1). OC emissions shall not exceed 3 lbs/hr and 15 lbs/day.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information for each day for the oven:
 - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emission rate for all coatings employed in the coating operations associated with the oven, i.e., the sum of the values from sections A.III.1.f for emissions units R010 and R011, multiplied by the maximum percentage of the emissions associated with the oven (as defined in section A.V.2 of this permit), in pounds per day;
 - b. the total number of hours the oven was in operation (this number should be the same as the number of hours the associated coating operations were in operation); and
 - c. the average hourly OC emission rate, i.e., (a)/(b), in pounds per hour (average) for the oven.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions exceeded 3 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions exceeded 15 lbs/day, and the actual OC emissions for each such day.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

3 lbs/hr of OC and 15 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section A.III.1. If required, testing to demonstrate compliance with the hourly emission limitation shall be conducted in accordance with Method 25 or 25A of 40 CFR Part 60, Appendix A. No testing is specifically required by this permit.
 - b. Emission Limitation:

2.73 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily values specified in section A.III.1.a, and then dividing by 2000 lbs/ton.

2. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booths (R010 and R011), the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 22% of the OC employed in the spray booths shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon a mass balance study conducted by the facility.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: P004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: P007 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
natural gas-fired, batch oven #4-6 vented to the thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-2800)	See A.I.2.a and A.I.2.b below.
	OAC rule 3745-21-07(G)(1)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. **Additional Terms and Conditions**

- a. The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- b. All OC emissions from this emissions unit shall be vented to the thermal oxidation system with a minimum 90% control efficiency.
- c. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.2.a and A.II.2.c, whenever the emissions unit is in operation.
- e. The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

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II. **Operational Restrictions**

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.2.a and A.II.2.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the thermal oxidation system.
3. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - b. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

All OC emissions from this emissions unit shall be vented to the thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for OC.
 - c. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: P007 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R006 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
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spray booth #1	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	<p>Measures</p> <p>Organic compound (OC) emissions shall not exceed 5.8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.</p> <p>Maximum annual emissions of OC, including cleanup materials, shall not exceed 2.0 tpy.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).</p>
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

- 1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(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 definition of "photochemically reactive material" is based upon OAC rule

3745-21-01(C)(5).]

2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 5.8 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - b. Emission Limitation:

5.8 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - c. For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1A) . This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.
 - d. Emission Limitation:

2.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.
 - e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).

f. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: R006 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions		

1. None

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R007 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
spray booth #2	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 7.95 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 2.0 tpy.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1). OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

- 2. **Additional Terms and Conditions**

- (a) None

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II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
- the company identification for each coating and cleanup material employed;
 - documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - the number of gallons of each coating and cleanup material employed;
 - the OC content of each coating and cleanup material, in pounds per gallon;
 - the total number of hours the emissions unit was in operation;
 - the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+), in pounds per day; and
 - for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 7.95 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for

the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - b. Emission Limitation:

7.95 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - c. For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1B). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.
 - d. Emission Limitation:

2.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.
 - e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - f. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: R007 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R010 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
spray booth #5	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 5.0 tpy.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1). OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;

- d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
- 2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8.0 lbs/hr, and the actual average hourly OC emissions for each such day.
- 2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
- 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping requirements specified in sections

A.III.1.j and A.III.1.i.

b. Emission Limitation:

8.0 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.

c. For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be the uncontrolled emissions for the oven associated with this emissions unit (P004). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.

d. Emission Limitation:

5.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).

f. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 063000007 Emissions Unit ID: R010 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R011 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
spray booth #6	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 4.64 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 5.0 tpy.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1). OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed,

the total OC emission rate for all coatings and cleanup materials, in pounds per day;

l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;

m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+), in pounds per day; and

n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 4.64 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - b. Emission Limitation:

4.64 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - c. For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be the uncontrolled emissions for the oven associated with this emissions unit (P004). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.
 - d. Emission Limitation:

5.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).

f. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: R011 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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> |
|---|---|--------------------------------------|--|
| 2. Additional Terms and Conditions | | | |
| 1. None | | | |

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R012 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
spray booth #7	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 9.86 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 11.67 tpy. The requirements of this rule also include compliance

OAC rule 3745-21-07(G)(2)	with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).
OAC rule 3745-17-07(A)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
OAC rule 3745-17-11(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. Particulate emissions shall not exceed 0.551 lb/hr.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

- 1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
- 2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 9.86 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
 3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - b. Emission Limitation:

9.86 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - c. For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1A). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.
 - d. Emission Limitation:

11.67 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.
 - e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - f. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: R012 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R013 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
spray booth #8	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 8.48 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 11.67 tpy.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1). OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(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 definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8.48 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - b. Emission Limitation:

8.48 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - c. For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1B). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.
 - d. Emission Limitation:

11.67 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.
 - e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - f. Emission Limitation:

0.551 lb/hr of particulate emissions

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).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 063000007 Emissions Unit ID: R013 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R014 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
prime booth 1 (spray booth #4-10)	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials. Particulate emissions shall not exceed 2.41 tpy.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1) OAC rule 3745-21-07(G)(2)	Particulate emissions shall not exceed 0.551 lb/hr. See A.I.2.a below.

2. Additional Terms and Conditions

- a. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

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II. Operational Restrictions

1. The permittee shall employ particulate removal equipment having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and 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.]
2. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 1.43 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - b. Emission Limitation:

1.43 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.f.
 - c. Emission Limitation:

6.25 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.d, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.
 - d. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

- e. Emission Limitation:
 - 2.41 tpy of particulate emissions
 - Applicable Compliance Method:
 - Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.
- 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0630000007 Emissions Unit ID: R014 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 063000007 Emissions Unit ID: R015 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
prime booth 2 (spray booth #4-11)	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials. Particulate emissions shall not exceed 2.41 tpy.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

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II. **Operational Restrictions**

- 1. The permittee shall employ particulate removal equipment having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.

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

- 1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;

- d. the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and 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.]
- 2. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 1.43 lbs/hr, and the actual average hourly OC emissions for each such day.
- 2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
- 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 20% opacity as a 6-minute average
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - b. Emission Limitation:
 - 1.43 lbs/hr of OC
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping specified in section A.III.1.f.
 - c. Emission Limitation:
 - 6.25 tpy of OC
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.d, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.
 - d. Emission Limitation:
 - 0.551 lb/hr of particulate emissions
 - 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).

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

- e. Emission Limitation:
 - 2.41 tpy of particulate emissions
 - Applicable Compliance Method:
 - Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.
- 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 063000007 Emissions Unit ID: R015 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 063000007 Emissions Unit ID: R016 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
paint booth 1 (spray booth #4-12) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 11.13 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 48.75 tpy, including cleanup materials. Particulate emissions shall not exceed 2.41 tpy. See A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. **Additional Terms and Conditions**

- a. The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- b. The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

- c. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- e. The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

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II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.
4. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), 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.]
5. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 11.13 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.
 - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - c. Emission Limitation:

11.13 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.
 - d. Emission Limitation:

48.75 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.
 - e. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

- f. Emission Limitation:
- 2.41 tpy of particulate emissions
- Applicable Compliance Method:
- Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
3. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: R016 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
paint booth 1 (spray booth #4-12) controlled with a Zeolite adsorption/thermal oxidation system		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (R016) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: butyl alcohol (n-butanol)
 TLV (ug/m3): 61,000
 Maximum Hourly Emission Rate (lbs/hr): 2.08*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
 MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

2. 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, 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.
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. 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 063000007 Emissions Unit ID: R018 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
paint booth 2 (spray booth #4-14) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 5.57 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 24.38 tpy, including cleanup materials. Particulate emissions shall not exceed 2.41 tpy. See A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

- 2. **Additional Terms and Conditions**

- a. The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- b. The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.
- c. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- e. The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

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II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not

functioning properly.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.
4. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), 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.]
5. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.The permittee shall also submit quarterly summaries that include a log of the downtime for the capture

(collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 5.57 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.
 - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - c. Emission Limitation:

5.57 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.
 - d. Emission Limitation:

24.38 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.
 - e. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

- f. Emission Limitation:
- 2.41 tpy of particulate emissions
- Applicable Compliance Method:
- Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
 - The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
3. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: R018 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
paint booth 2 (spray booth #4-14) controlled with a Zeolite adsorption/thermal oxidation system		

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (R018) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: butyl alcohol (n-butanol)
 TLV (ug/m3): 61,000
 Maximum Hourly Emission Rate (lbs/hr): 2.08*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
 MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

- 2. 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, 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.

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. 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0630000007 Emissions Unit ID: R019 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
clearcoat booth 2 (spray booth #4-15) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 10.24 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 44.85 tpy, including cleanup materials. Particulate emissions shall not exceed 2.41 tpy. See A.I.2.a and A.I.2.b below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).

OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
OAC rule 3745-21-07(G)(2)	See A.I.2.c below.
OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. **Additional Terms and Conditions**

- a. The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- b. The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.
- c. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- e. The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

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II. **Operational Restrictions**

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and

- g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
 6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
 7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.
4. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), 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.]
5. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer,

when the emissions unit was in operation, does not comply with the temperature limitation specified above;

b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and

c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 10.24 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.
 - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - c. Emission Limitation:

10.24 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.
 - d. Emission Limitation:

44.85 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.
 - e. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and

cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0630000007 Emissions Unit ID: R019 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
clearcoat booth 2 (spray booth #4-15) controlled with a Zeolite adsorption/thermal oxidation system		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (R019) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: butyl alcohol (n-butanol)
TLV (ug/m3): 61,000
Maximum Hourly Emission Rate (lbs/hr): 2.08*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

2. 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, 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.

- 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. 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 063000007 Emissions Unit ID: R021 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
clearcoat booth 1 (spray booth #4-17) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 2.56 lbs/hr, including cleanup materials.

Maximum annual OC emissions shall not exceed 11.21 tpy, including cleanup materials.

Particulate emissions shall not exceed 2.41 tpy.

See A.I.2.a and A.I.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).

OAC rule 3745-17-07(A)

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

OAC rule 3745-17-11(B)(1)

Particulate emissions shall not exceed 0.551 lb/hr.

OAC rule 3745-21-07(G)(2)

See A.I.2.c below.

OAC rule 3745-21-07(G)(6)

See A.I.2.c below.

2. Additional Terms and Conditions

- a. The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- b. The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.
- c. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- e. The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

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II. Operational Restrictions

- 1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
- 4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls,

floor and ceiling;

- c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
 6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
 7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

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

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.
4. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), 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.]
5. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal

equipment was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 2.56 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.
 - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon 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 OAC rule 3745-15-04(A).
 - c. Emission Limitation:

2.56 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.
 - d. Emission Limitation:

11.21 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

e. Emission Limitation:

0.551 lb/hr of particulate emissions

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).

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the

operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 063000007 Emissions Unit ID: R021 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
clearcoat booth 1 (spray booth #4-17) controlled with a Zeolite adsorption/thermal oxidation system		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (R021) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: butyl alcohol (n-butanol)
 TLV (ug/m3): 61,000
 Maximum Hourly Emission Rate (lbs/hr): 2.08*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
 MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

2. 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, 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.
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. 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.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None