

Facility ID: 0630010130 Issuance type: Final State Permit To Operate

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

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

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

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0630010130 Emissions Unit ID: R003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint Booth #2	OAC rule 3745-31-05(A)(3) (PTI 06-5768)	Emissions of organic compounds (OC) shall not exceed 1.485 lbs/hr and 6.5 tons/yr.
	OAC rule 3745-17-07(A)	Compliance with the Air Toxics Policy. See sections C.4, C.5, and C.6. 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)	Particulate emissions (PE) shall not exceed 0.551 lb/hr and 2.41 tons/yr.
	OAC rule 3745-21-09(U)(2)(e)(iii)	Exempt from the requirements of OAC rule 3745-21-09(U)(1) based on maximum daily coating usage not to exceed 10 gallons per day.
		See section B.1 below.

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

**B. Operational Restrictions**

1. The permittee shall not employ more than 10 gallons of coating on metal parts in any given day in this emissions unit.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the volume, in gallons, of each cleanup material employed;
  - d. the total volume, in gallons, of all of the coatings employed; and
  - e. the total volume, in gallons, of all of the cleanup materials employed.
2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the OC content of each coating and cleanup material, in pounds per gallon;
  - b. the total OC emission rate for all coatings, in pounds per day;
  - c. the total OC emission rate for all cleanup materials, in pounds per day;

- d. the total OC emission rate for all coatings and cleanup materials (b+c), 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, (d/e), in pounds per hour (average).
3. 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.
4. The permit to install for this emissions unit (R003) 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: Toluene  
 TLV (ug/m3): 188,000  
 Maximum Hourly Emission Rate (lbs/hr): 0.33  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.684  
 MAGLC (ug/m3): 4,880
5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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.
6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that the emissions unit employs more than the maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 45 days after the exceedance occurs.
2. 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.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 1.485 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation:
- Emissions of OC shall not exceed 1.485 lbs/hr.
- Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section C.2.f.

If required, the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for OC: Methods 1 through 4 and Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.  
Emission Limitation:

Emissions of OC shall not exceed 6.5 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in Section C.2.d. (i.e., the summation of the daily values for the total OC emissions, in lbs, for all coatings and cleanup materials, divided by 2000 lbs/ton).

Emission Limitation:

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

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).

Emission Limitation:

PE shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lb/hr);

M = maximum coating solids usage rate (lbs/hr);

TE = transfer efficiency (in percent, expressed as a decimal), which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = efficiency of the control equipment (in percent, expressed as a decimal) - 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).

Emission Limitation:

PE shall not exceed 2.41 tons/yr.

Applicable Compliance Method:

Compliance with the annual (tons/yr) emission limitation shall be based on the following calculation:

$$PE \text{ (lb/hr)} \times 8760 \text{ hrs/yr} \times 0.0005 \text{ ton/lb} = PE \text{ (tons/yr)}$$

Therefore, provided compliance is shown with the maximum hourly PE limitation, compliance shall also be shown with the annual emission limitation.

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

**F. Miscellaneous Requirements**

1. None