

Facility ID: 0121010005 Issuance type: Title V Draft 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.

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

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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:

B002 - 4.185 mmBtu/hr, natural gas-fired boiler no. 6N001
 B003 - 9.0 mmBtu/hr, natural gas-fired boiler no. 808
 B004 - 9.0 mmBtu/hr, natural gas-fired boiler no. 809
 B007 - 8.17 mmBtu/hr, natural gas-fired boiler no. 199276
 B008 - 8.17 mmBtu/hr, natural gas-fired boiler no. 192093
 B009 - 8.17 mmBtu/hr, natural gas-fired boiler no. 192094
 B010 - Uniprime gas oven
 B011 - Uniprime gas oven
 J001 - solvent and monomer unloading
 J002 - resin unloading
 J003 - paint tank truck loading station
 J004 - Uniprime resin load rack
 K001 - liquid cutting booth
 L001 - paint plant solvent sink
 L002 - paint plant solvent sink
 L003 - paint plant solvent sink
 L004 - paint plant solvent sink
 P005 - thinner blend tank
 P012 - waste tank
 P013 - waste tank
 P014 - dispersion mill
 P017 - drum/IBC fill line
 P021 - volumetric machine fill no.1
 P023 - high speed disperser
 P024 - high speed disperser
 P025 - high speed disperser
 P026 - high speed disperser
 P027 - high speed disperser
 P028 - high speed disperser
 P029 - high speed disperser
 P036 - Uniprime filter cleaning tank
 P037 - high speed disperser
 P038 - dispersion mill
 P039 - dispersion mill
 P040 - dispersion mill
 P041 - high speed disperser
 P044 - high speed disperser
 P045 - high speed disperser
 P046 - weigh scale/raw material handling room
 P047 - weigh scale/raw material handling room
 P048 - weigh scale/raw material handling room
 P049 - dispersion mill
 P050 - dispersion mill
 P051 - dispersion mill
 P052 - refinish intermix disperser
 P053 - coil intermix disperser
 P054 - handfill paint tanks
 P055 - dispersion mill
 P056 - dispersion mill

P057 - dispersion mill
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P069 - dispersion mill
P070 - dispersion mill
P071 - dispersion mill
P072 - high speed disperser
P073 - high speed disperser
P074 - high speed disperser
P075 - dispersion mill
P076 - dispersion mill
P077 - dispersion mill
P078 - dispersion mill
P079 - dispersion mill
P080 - dispersion mill
P081 - dispersion mill
P082 - volumetric machine fill no. 2
P083 - volumetric machine fill no. 1
P084 - volumetric machine fill no. 1
P085 - dispersion mill
P086 - dispersion mill
P087 - dispersion mill
P088 - dispersion mill
P089 - dispersion mill
P201 - lab oven
P202 - lab oven
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P206 - lab oven
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P210 - lab oven
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P255 - lab hood
P256 - lab oven
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P261 - lab hood
P262 - spray room oven - QC
P263 - spray room oven - QC
P264 - spray room oven - QC
P265 - spray room oven - QC
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P267 - spray room oven - QC
P268 - spray room oven - QC
P269 - spray room oven - QC
P270 - rollcoater
P271 - paint process tank
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P451 - paint process tank
P452 - paint process tank
P453 - paint process tank
P454 - paint process tank
P455 - paint process tank
P456 - paint process tank
P457 - paint process tank
P458 - high speed disperser
R001 - Uniprime spray booth
R203 - lab spray booth
R204 - lab spray booth
R205 - lab spray booth

R207 - lab spray booth
R208 - lab spray booth
R209 - lab spray booth
R216 - lab spray booth
R217 - lab spray booth
R218 - lab spray booth
R219 - lab spray booth
R220 - lab spray booth
T001 - organic waste tank
T002 - finished product storage tank
T003 - finished product storage tank
T004 - resin raw material storage tank
T005 - resin raw material storage tank
T006 - resin raw material storage tank
T007 - resin raw material storage tank
T008 - resin raw material storage tank
T009 - resin raw material storage tank
T010 - resin raw material storage tank
T011 - resin raw material storage tank
T012 - resin raw material storage tank
T013 - resin raw material storage tank
T014 - resin raw material storage tank
T015 - resin raw material storage tank
T016 - resin raw material storage tank
T017 - resin raw material storage tank
T018 - no. 2 fuel oil storage tank
T019 - resin raw material storage tank
T031 - coatings raw material storage tank
T032 - coatings raw material storage tank
T033 - coatings raw material storage tank
T034 - coatings raw material storage tank
T035 - coatings raw material storage tank
T036 - coatings raw material storage tank
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T065 - coatings raw material storage tank
T066 - resin raw material storage tank
T067 - resin raw material storage tank
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T091 - resin raw material storage tank
T092 - resin raw material storage tank
T093 - resin raw material storage tank
T094 - resin raw material storage tank
T095 - resin raw material storage tank
T096 - resin raw material storage tank
T097 - resin raw material storage tank
T098 - Uniprime batch tank
T099 - Uniprime batch tank
T100 - Uniprime batch tank
T101 - Uniprime batch tank
T102 - Uniprime batch tank
T103 - Uniprime batch tank
T104 - Uniprime mixing tank
T105 - Uniprime mixing tank
T106 - Uniprime mixing tank
T107 - Uniprime mixing tank
T108 - Uniprime mixing tank
T109 - Uniprime blend tank
T110 - Uniprime storage tank
T111 - Uniprime storage tank
T112 - resin raw material storage tank
T113 - resin raw material storage tank
T114 - resin raw material storage tank
T115 - resin raw material storage tank
Z033 - solvent storage shed - factory lab
Z034 - paint plant emergency generator
Z035 - paint plant diesel fire water pump
Z036 - paint plant diesel fire water pump
Z037 - cooling towers emergency generator
Z038 - natural gas emergency generator
Z043 - paved roads
Z044 - 8.17 mmBtu/hr, boiler no. 191328
Z045 - coil intermix rail mixer W1
Z046 - coil intermix rail mixer W2
Z047 - coil intermix rail mixer W3
Z048 - coil intermix rail mixer W4
Z049 - coil intermix rail mixer X1
Z050 - coil intermix rail mixer X2
Z051 - coil intermix rail mixer X3
Z052 - coil intermix rail mixer X4
Z053 - coil intermix rail mixer Y1
Z054 - coil intermix rail mixer Y2
Z055 - coil intermix rail mixer Y3

Z056 - coil intermix rail mixer Y4
Z057 - coil intermix rail mixer Z1
Z058 - coil intermix rail mixer Z2
Z059 - coil intermix rail mixer Z3
Z060 - refinish rail mixer A1
Z061 - refinish rail mixer A2
Z062 - refinish rail mixer A3
Z063 - refinish rail mixer A4
Z064 - refinish rail mixer B1
Z065 - refinish rail mixer B2
Z066 - refinish rail mixer B3
Z067 - refinish rail mixer B4
Z068 - refinish rail mixer C1
Z069 - refinish rail mixer C2
Z070 - refinish rail mixer C3
Z071 - refinish rail mixer C4
Z072 - refinish rail mixer D1
Z073 - refinish rail mixer D2
Z074 - refinish rail mixer D3
Z075 - refinish rail mixer D4
Z076 - refinish rail mixer E1
Z077 - refinish rail mixer E2
Z078 - refinish rail mixer E3
Z079 - refinish rail mixer E4
Z080 - technical lab solvent sink
Z081 - technical lab solvent sink
Z082 - technical lab solvent sink
Z083 - technical lab solvent sink
Z084 - technical lab solvent sink
Z085 - technical lab solvent sink
Z086 - technical lab solvent sink
Z087 - technical lab solvent sink
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Z114 - technical lab solvent sink
Z115 - technical lab solvent sink
Z116 - technical lab solvent sink
Z117 - technical lab solvent sink
Z118 - technical lab solvent sink
Z119 - technical lab solvent sink
Z120 - resin plant solvent sink
Z121 - resin plant solvent sink
Z122 - resin plant solvent sink
Z123 - resin plant solvent sink
Z124 - resin plant solvent sink
Z125 - resin plant solvent sink
Z126 - Uniprime solvent sink
Z127 - Uniprime solvent sink
Z128 - Uniprime solvent sink
Z129 - Uniprime solvent sink
Z130 - Uniprime solvent sink
Z131 - Uniprime solvent sink
Z132 - Uniprime solvent sink
Z133 - paint plant solvent sink
Z134 - paint plant solvent sink
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Z136 - paint plant solvent sink
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Z138 - paint plant solvent sink
Z139 - paint plant solvent sink
Z140 - paint plant solvent sink

Z141 - paint plant solvent sink

Z142 - paint plant solvent sink
Z143 - paint plant solvent sink
Z144 - paint plant solvent sink
Z149 - SOD rail mixer
Z150 - SOD rail mixer
Z151 - SOD rail mixer
Z152 - SOD rail mixer
Z153 - SOD rail mixer

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

The following insignificant emissions units are located at this facility:

B002 - 4.185 mmBtu/hr, natural gas-fired boiler no. 6N001
B003 - 9.0 mmBtu/hr, natural gas-fired boiler no. 808
B004 - 9.0 mmBtu/hr, natural gas-fired boiler no. 809
B007 - 8.17 mmBtu/hr, natural gas-fired boiler no. 199276
B008 - 8.17 mmBtu/hr, natural gas-fired boiler no. 192093
B009 - 8.17 mmBtu/hr, natural gas-fired boiler no. 192094
B010 - Uniprime gas oven
B011 - Uniprime gas oven
J001 - solvent and monomer unloading
J002 - resin unloading
J003 - paint tank truck loading station
J004 - Uniprime resin load rack
K001 - liquid cutting booth
L001 - paint plant solvent sink
L002 - paint plant solvent sink
L003 - paint plant solvent sink
L004 - paint plant solvent sink
P005 - thinner blend tank
P012 - waste tank
P013 - waste tank
P014 - dispersion mill
P017 - drum/IBC fill line
P021 - volumetric machine fill no.1
P023 - high speed disperser
P024 - high speed disperser
P025 - high speed disperser
P026 - high speed disperser
P027 - high speed disperser
P028 - high speed disperser
P029 - high speed disperser
P036 - Uniprime filter cleaning tank
P037 - high speed disperser
P038 - dispersion mill
P039 - dispersion mill
P040 - dispersion mill
P041 - high speed disperser
P044 - high speed disperser
P045 - high speed disperser
P046 - weigh scale/raw material handling room
P047 - weigh scale/raw material handling room
P048 - weigh scale/raw material handling room
P049 - dispersion mill
P050 - dispersion mill
P051 - dispersion mill
P052 - refinish intermix disperser
P053 - coil intermix disperser
P054 - handfill paint tanks
P055 - dispersion mill
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P071 - dispersion mill
P072 - high speed disperser
P073 - high speed disperser
P074 - high speed disperser
P075 - dispersion mill
P076 - dispersion mill
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P079 - dispersion mill
P080 - dispersion mill
P081 - dispersion mill
P082 - volumetric machine fill no. 2
P083 - volumetric machine fill no. 1
P084 - volumetric machine fill no. 1
P085 - dispersion mill
P086 - dispersion mill
P087 - dispersion mill
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P089 - dispersion mill
P201 - lab oven
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P256 - lab oven
P257 - lab oven
P259 - lab oven
P260 - lab hood
P261 - lab hood
P262 - spray room oven - QC
P263 - spray room oven - QC
P264 - spray room oven - QC
P265 - spray room oven - QC
P266 - spray room oven - QC
P267 - spray room oven - QC
P268 - spray room oven - QC
P269 - spray room oven - QC
P270 - rollcoater
P271 - paint process tank
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P440 - paint process tank
P441 - paint process tank
P442 - paint process tank
P443 - paint process tank
P444 - paint process tank
P445 - paint process tank

P446 - paint process tank
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P451 - paint process tank
P452 - paint process tank
P453 - paint process tank
P454 - paint process tank
P455 - paint process tank
P456 - paint process tank
P457 - paint process tank
P458 - high speed disperser
R001 - Uniprime spray booth
R203 - lab spray booth
R204 - lab spray booth
R205 - lab spray booth

R207 - lab spray booth
R208 - lab spray booth
R209 - lab spray booth
R216 - lab spray booth
R217 - lab spray booth
R218 - lab spray booth
R219 - lab spray booth
R220 - lab spray booth
T001 - organic waste tank
T002 - finished product storage tank
T003 - finished product storage tank
T004 - resin raw material storage tank
T005 - resin raw material storage tank
T006 - resin raw material storage tank
T007 - resin raw material storage tank
T008 - resin raw material storage tank
T009 - resin raw material storage tank
T010 - resin raw material storage tank
T011 - resin raw material storage tank
T012 - resin raw material storage tank
T013 - resin raw material storage tank
T014 - resin raw material storage tank
T015 - resin raw material storage tank
T016 - resin raw material storage tank
T017 - resin raw material storage tank
T018 - no. 2 fuel oil storage tank
T019 - resin raw material storage tank
T031 - coatings raw material storage tank
T032 - coatings raw material storage tank
T033 - coatings raw material storage tank
T034 - coatings raw material storage tank
T035 - coatings raw material storage tank
T036 - coatings raw material storage tank
T037 - coatings raw material storage tank
T038 - coatings raw material storage tank
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T040 - coatings raw material storage tank
T041 - coatings raw material storage tank
T042 - coatings raw material storage tank
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T062 - coatings raw material storage tank
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T064 - coatings raw material storage tank
T065 - coatings raw material storage tank
T066 - resin raw material storage tank
T067 - resin raw material storage tank
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T071 - resin raw material storage tank
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T092 - resin raw material storage tank
T093 - resin raw material storage tank
T094 - resin raw material storage tank
T095 - resin raw material storage tank
T096 - resin raw material storage tank
T097 - resin raw material storage tank
T098 - Uniprime batch tank
T099 - Uniprime batch tank
T100 - Uniprime batch tank
T101 - Uniprime batch tank
T102 - Uniprime batch tank
T103 - Uniprime batch tank
T104 - Uniprime mixing tank
T105 - Uniprime mixing tank
T106 - Uniprime mixing tank
T107 - Uniprime mixing tank
T108 - Uniprime mixing tank
T109 - Uniprime blend tank
T110 - Uniprime storage tank
T111 - Uniprime storage tank
T112 - resin raw material storage tank
T113 - resin raw material storage tank
T114 - resin raw material storage tank
T115 - resin raw material storage tank
Z033 - solvent storage shed - factory lab
Z034 - paint plant emergency generator
Z035 - paint plant diesel fire water pump
Z036 - paint plant diesel fire water pump
Z037 - cooling towers emergency generator
Z038 - natural gas emergency generator
Z043 - paved roads
Z044 - 8.17 mmBtu/hr, boiler no. 191328
Z045 - coil intermix rail mixer W1
Z046 - coil intermix rail mixer W2
Z047 - coil intermix rail mixer W3
Z048 - coil intermix rail mixer W4
Z049 - coil intermix rail mixer X1
Z050 - coil intermix rail mixer X2
Z051 - coil intermix rail mixer X3
Z052 - coil intermix rail mixer X4
Z053 - coil intermix rail mixer Y1
Z054 - coil intermix rail mixer Y2
Z055 - coil intermix rail mixer Y3
Z056 - coil intermix rail mixer Y4
Z057 - coil intermix rail mixer Z1
Z058 - coil intermix rail mixer Z2
Z059 - coil intermix rail mixer Z3
Z060 - refinish rail mixer A1
Z061 - refinish rail mixer A2
Z062 - refinish rail mixer A3
Z063 - refinish rail mixer A4
Z064 - refinish rail mixer B1
Z065 - refinish rail mixer B2
Z066 - refinish rail mixer B3
Z067 - refinish rail mixer B4
Z068 - refinish rail mixer C1
Z069 - refinish rail mixer C2
Z070 - refinish rail mixer C3
Z071 - refinish rail mixer C4
Z072 - refinish rail mixer D1
Z073 - refinish rail mixer D2
Z074 - refinish rail mixer D3
Z075 - refinish rail mixer D4
Z076 - refinish rail mixer E1

Z077 - refinish rail mixer E2
Z078 - refinish rail mixer E3
Z079 - refinish rail mixer E4
Z080 - technical lab solvent sink
Z081 - technical lab solvent sink
Z082 - technical lab solvent sink
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Z117 - technical lab solvent sink
Z118 - technical lab solvent sink
Z119 - technical lab solvent sink
Z120 - resin plant solvent sink
Z121 - resin plant solvent sink
Z122 - resin plant solvent sink
Z123 - resin plant solvent sink
Z124 - resin plant solvent sink
Z125 - resin plant solvent sink
Z126 - Uniprime solvent sink
Z127 - Uniprime solvent sink
Z128 - Uniprime solvent sink
Z129 - Uniprime solvent sink
Z130 - Uniprime solvent sink
Z131 - Uniprime solvent sink
Z132 - Uniprime solvent sink
Z133 - paint plant solvent sink
Z134 - paint plant solvent sink
Z135 - paint plant solvent sink
Z136 - paint plant solvent sink
Z137 - paint plant solvent sink
Z138 - paint plant solvent sink
Z139 - paint plant solvent sink
Z140 - paint plant solvent sink
Z141 - paint plant solvent sink
Z142 - paint plant solvent sink
Z143 - paint plant solvent sink
Z144 - paint plant solvent sink
Z149 - SOD rail mixer
Z150 - SOD rail mixer
Z151 - SOD rail mixer
Z152 - SOD rail mixer
Z153 - SOD rail mixer

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

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0121010005 Emissions Unit ID: B012 Issuance type: Title V Draft 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>
16,738 mmBtu/hr natural gas or distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) steam boiler no. 3 (6A703)	OAC rule 3745-31-05(A)(3) (PTI 01-2155)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), and 3745-18-06(D).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed .020 lb/mmBtu of actual heat input.
	OAC rule 3745-18-06(D)	When firing distillate oil, sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	None, see A.I.2.a below.

2. Additional Terms and Conditions

- a. The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively.

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II. Operational Restrictions

1. The permittee shall burn only natural gas or distillate oil in this emissions unit.
2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/mmBtu actual heat input.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or distillate oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.
3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 45 days after the deviation occurs.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Particulate emissions shall not exceed .020 lb/mmBtu actual heat input.

Applicable Compliance Method:
When firing natural gas, compliance with this emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (16.738 ft3/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for filterable particulates in natural gas combustion (1.9 lbs of particulates/mmf3), and dividing by the maximum hourly heat input capacity of the emissions unit (16.738 mmBtu/hr).

When firing distillate oil, compliance with this emission limitation shall be demonstrated by multiplying the maximum fuel oil burning capacity of the emissions unit (120 gal/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.3-1 (9/98) for filterable particulates in number two fuel oil combustion (2 lbs of particulates/1000 gal), and dividing by the maximum hourly heat input capacity of the emissions unit (16.738 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9) while firing distillate oil.
 - b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- c. Emission Limitation:
Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

Applicable Compliance Method:

When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6, while firing distillate oil.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: B012 Issuance type: Title V Draft 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>
16.738 mmBtu/hr natural gas or distillate oil- none fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) steam boiler no. 3 (6A703)		none

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: 0121010005 Emissions Unit ID: B013 Issuance type: Title V Draft 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>
16,738 mmBtu/hr natural gas or distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) steam boiler no. 1 (6A701)	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed .020 lb/mmBtu of actual heat input.
	OAC rule 3745-18-06(D)	When firing distillate oil, sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. The permittee shall burn only natural gas or distillate oil in this emissions unit.
2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/mmBtu actual heat input.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or distillate oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.
3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 45 days after the deviation occurs.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Particulate emissions shall not exceed .020 lb/mmBtu actual heat input.

Applicable Compliance Method:
When firing natural gas, compliance with this emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (16.738 ft³/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for filterable particulates in natural gas combustion (1.9 lbs of particulates/mmft³), and dividing by the maximum hourly heat input capacity of the emissions unit (16.738 mmBtu/hr).

When firing distillate oil, compliance with this emission limitation shall be demonstrated by multiplying the maximum fuel oil burning capacity of the emissions unit (120 gal/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.3-1 (9/98) for filterable particulates in number two fuel oil combustion (2 lbs of particulates/1000 gal), and dividing by the maximum hourly heat input capacity of the emissions unit (16.738 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9) while firing distillate oil.
 - b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
 - c. Emission Limitation:
Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

Applicable Compliance Method:
When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission

tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6, while firing distillate oil.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: B013 Issuance type: Title V Draft 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>
16.738 mmBtu/hr natural gas or distillate oil- fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) steam boiler no. 1 (6A701)	none	none

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: 0121010005 Emissions Unit ID: B014 Issuance type: Title V Draft 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>
16.738 mmBtu/hr natural gas or distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) steam boiler no. 2 (6A702)	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed .020 lb/mmBtu of actual heat input.
	OAC rule 3745-18-06(D)	When firing distillate oil, sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas or distillate oil in this emissions unit.
2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/mmBtu actual heat input.

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

1. For each day during which the permittee burns a fuel other than natural gas and/or distillate oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.
3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 45 days after the deviation occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
Particulate emissions shall not exceed .020 lb/mmBtu actual heat input.

Applicable Compliance Method:

When firing natural gas, compliance with this emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (16.738 ft³/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for filterable particulates in natural gas combustion (1.9 lbs of particulates/mmft³), and dividing by the maximum hourly heat input capacity of the emissions unit (16.738 mmBtu/hr).

When firing number distillate oil, compliance with this emission limitation shall be demonstrated by multiplying the maximum fuel oil burning capacity of the emissions unit (120 gal/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.3-1 (9/98) for filterable particulates in number two fuel oil combustion (2 lbs of particulates/1000 gal), and dividing by the maximum hourly heat input capacity of the emissions unit (16.738 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9) while firing distillate oil.

- b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions 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).

- c. Emission Limitation:
Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

Applicable Compliance Method:

When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6, while firing distillate oil.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: B014 Issuance type: Title V Draft 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>
16.738 mmBtu/hr natural gas or distillate oil- fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) steam boiler no. 2 (6A702)	none	none

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: 0121010005 Emissions Unit ID: P003 Issuance type: Title V Draft 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>
portable tank cleaning system, controlled by a thermal oxidation unit (TOU)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

2. Additional Terms and Conditions

- a. OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.

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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 less than 1300 degrees F.

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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 unit 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 combustion temperature. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information on a daily basis:
 - 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 less than 1300 degrees F; and
 - b. 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 which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and any monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the

following methods:

- a. **Emission Limitations:**
Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - i. The emission testing shall be conducted within 6 months of permit issuance and 6 months of permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal oxidizer.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Methods 1 through 4 and 25 or 25A 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 method 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.
 - iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- a. 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. 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."
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P003 Issuance type: Title V Draft 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>
portable tank cleaning system, controlled by a thermal oxidation unit (TOU)	none	none

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: 0121010005 Emissions Unit ID: P006 Issuance type: Title V Draft 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.

Applicable Emissions Limitations/Control

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Measures</u>
paint plant solvent recovery system - solvent still no. 1, solvent still no. 2, receiver vessel no. 1 and receiver vessel no. 2, controlled by a thermal oxidation unit (TOU)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

2. Additional Terms and Conditions

- a. OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.

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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 less than 1300 degrees F.

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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 unit 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 combustion temperature. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information on a daily basis:
 - 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 less than 1300 degrees F; and
 - b. 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 which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and any monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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

 - i. The emission testing shall be conducted within 6 months of permit issuance and 6 months of permit expiration.

- ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal oxidizer.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Methods 1 through 4 and 25 or 25A 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 method 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.
 - iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- a. 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. 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."
- 2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P006 Issuance type: Title V Draft 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 plant solvent recovery system - solvent still no. 1, solvent still no. 2, receiver vessel no. 1 and receiver vessel no. 2, controlled by	none	none

- a thermal oxidation unit (TOU)
- 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: 0121010005 Emissions Unit ID: P008 Issuance type: Title V Draft 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>
resin reactor no. 1, controlled by a thermal oxidation unit (TOU)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-31-05(A)(3) (PTI 01-289)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(G)(6).

- 2. **Additional Terms and Conditions**

- a. OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.

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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 less than 1300 degrees F.

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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 unit 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 combustion temperature. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information on a daily basis:
 - 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 less than 1300 degrees F; and
 - b. 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 which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and any monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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

 - i. The emission testing shall be conducted within 6 months of permit issuance and 6 months of permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal oxidizer.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Method 25 or 25A 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 method 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.

- iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- a. 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. 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."
- 2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P008 Issuance type: Title V Draft 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>
resin reactor no. 1, controlled by a thermal oxidation unit (TOU)	none	none

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: 0121010005 Emissions Unit ID: P009 Issuance type: Title V Draft 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>
resin reactor no. 2, controlled by a thermal oxidation unit (TOU) and a fabric filter during solids charging	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 2.13 lbs/hr, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI 01-289)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(2), 3745-21-07(G)(6), 3745-17-11(B) and 3745-17-07(A).

2. **Additional Terms and Conditions**

- a. OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.

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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 less than 1300 degrees F.
2. The bags in the fabric filter shall be replaced on a quarterly basis.

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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 unit 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 combustion temperature. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information on a daily basis:
 - 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 less than 1300 degrees F; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall perform daily checks for visible particulate emissions from the fabric filter serving this emissions unit during solids loading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and any monitoring equipment, when the associated emissions unit was in operation. The quarterly summaries shall also indicate the date(s) when the bags in the fabric filter were replaced. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall submit quarterly written reports which (a) identify all days during which any visible emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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

 - i. The emission testing shall be conducted within 6 months of permit issuance and 6 months of permit

expiration.

- ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal oxidizer.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Method 25 or 25A 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 method 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.
 - iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- a. 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. 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."
- c. **Emission Limitation:**
Particulate emissions (PE) shall not exceed 2.13 lbs/hr, based on Table I which is more stringent than the allowable PE rate from Figure II.
- Applicable Compliance Method:
Compliance may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of solids loaded (0.375 ton/hr) by the control efficiency (CE) of the baghouse (1-0.98).
- If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-09(B)(9).
- d. **Emission Limitation:**
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:
If required, compliance shall be determined through visible emissions 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).
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P009 Issuance type: Title V Draft 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>
resin reactor no. 2, controlled by a thermal oxidation unit (TOU) and a fabric filter during solids charging	none	none

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: 0121010005 Emissions Unit ID: P010 Issuance type: Title V Draft 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>
resin plant solvent recovery system controlled by a thermal oxidation unit (TOU)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-31-05(A)(3) (PTI 01-289)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(2) and 3745-21-07(G)(6).

2. Additional Terms and Conditions

- a. OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.

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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 less than 1300 degrees F.

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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 unit 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 combustion temperature. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information on a daily basis:
 - 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 less than 1300 degrees F; and
 - b. 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 which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and any monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the

following methods:

- a. **Emission Limitations:**
Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - i. The emission testing shall be conducted within 6 months of permit issuance and 6 months of permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal oxidizer.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Methods 1 through 4 and 25 or 25A 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 method 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.
 - iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- a. 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. 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."
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P010 Issuance type: Title V Draft 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>
resin plant solvent recovery system controlled by a thermal oxidation unit (TOU)	none	none

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: 0121010005 Emissions Unit ID: P042 Issuance type: Title V Draft 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.

Applicable Emissions Limitations/Control

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Measures</u>
resin reactor no. 3, controlled by a thermal oxidation unit (TOU) and a fabric filter during solids charging	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 2.13 lbs/hr, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI 01-862)	Volatile organic compound (VOC) emissions shall not exceed 2.85 tons per year from emissions units P042 and P043, combined.
		Particulate emissions (PE) shall not exceed 2.1 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-07(G)(6), 3745-17-11(B), and 3745-17-07(A).
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.
2. Additional Terms and Conditions		
a.	OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.	
b.	Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this fugitive emissions unit.	
c.	Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.	

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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 less than 1300 degrees F.
2. The bags in the fabric filter shall be replaced on a quarterly basis.

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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 unit 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 combustion temperature. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information on a daily basis:
 - 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 less than 1300 degrees F;
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
 - c. the total hours of operation of the emissions unit.
3. The permittee shall perform daily checks for visible particulate emissions from the fabric filter serving this emissions unit during solids loading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and any monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. If required, the permittee shall submit quarterly written reports which (a) identify all days during which any visible emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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

 - i. The emission testing shall be conducted within 6 months of permit issuance and 6 months of permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal oxidizer.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Method 25 or 25A 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 method 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.
 - iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
 - a. 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. 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."
 - c. Emission Limitation:

Particulate emissions (PE) shall not exceed 2.13 lbs/hr, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
Compliance may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of solids loaded (0.375 ton of particulate matter/hr) by the control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedure specified

in OAC rule 3745-17-03(B)(9).

- d. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions 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).

- e. Emission Limitation:
Volatile organic compound (VOC) emissions shall not exceed 2.85 tons per year from emissions units P042 and P043, combined.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the results of the emission tests for P042 and P043 (specified in A.V.1.a), in lbs VOC/hr from the thermal oxidizer, multiplying by the actual hours of operation per year, and dividing by 2000 pounds per ton.

- f. Emission Limitation:
Particulate emissions shall not exceed 2.1 tons per year.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the emission factor of 5.5 lbs of particulate matter/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of solids loaded (0.375 ton/hr) by the control efficiency (CE) of the baghouse (1-0.98) by 8760 hrs/yr and dividing by 2000 lbs/ton.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P042 Issuance type: Title V Draft 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</u>
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- Measures
- resin reactor no. 3, controlled by a thermal oxidation unit (TOU) and a fabric filter during solids charging none
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: 0121010005 Emissions Unit ID: P043 Issuance type: Title V Draft 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>
resin plant cationic stripper, controlled by a thermal oxidation unit (TOU)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not

(PTI 01-862)

exceed 2.85 tons per year from emission units P042 and P043 combined.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-21-07(G)(6).

2. Additional Terms and Conditions

- a. OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.

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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 less than 1300 degrees F.

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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 unit 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 combustion temperature. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information on a daily basis:
 - 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 less than 1300 degrees F;
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
 - c. the total hours of operation of the emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and any monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Ninety percent (90%) or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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

 - i. The emission testing shall be conducted within 6 months of permit issuance and 6 months of permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency

limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal oxidizer.

iii. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Method 25 or 25A 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 method 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.

iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

- a. 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. 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."
- c. Emission Limitation:
Volatile organic compound (VOC) emissions shall not exceed 2.85 tons per year from emissions units P042 and P043, combined.
- Applicable Compliance Method:
Compliance shall be demonstrated by summing the results of the emission tests for P042 and P043 (specified in A.V.1.a), in lbs VOC/hr from the thermal oxidizer, multiplying by the actual hours of operation per year, and dividing by 2000 pounds per ton.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P043 Issuance type: Title V Draft 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>
resin plant cationic stripper, controlled by a thermal oxidation unit (TOU)	none	none

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: 0121010005 Emissions Unit ID: P093 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-11(B)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. Particulate emissions (PE) shall not exceed 0.71 pound per hour, based on Table I which is more stringent than

- | | | |
|--|------------------------|--|
| | OAC rule 3745-17-07(A) | the allowable PE rate from Figure II.
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule. |
| | OAC rule 3745-17-08(B) | See A.I.2.a below. |
| | OAC rule 3745-17-07(B) | See A.I.2.b below. |
2. **Additional Terms and Conditions**
- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
 - b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

$$E_{tot} = \text{summation of } (E_d)$$

Where:
 E_d = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 E_{tot} = total daily OC emission rate for all batches (lbs)
 - b. Emission Limitation:

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

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
 - c. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.71 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.0725 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P093 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none

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: 0121010005 Emissions Unit ID: P094 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.71 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs), calculated as the sum of the daily OC emission rates for all batches

for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

Etot = summation of (E_d)

Where:
 E_d = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 Etot = total daily OC emission rate for all batches (lbs)
 - b. Emission Limitation:

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

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
 - c. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.71 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.0725 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P094 Issuance type: Title V Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
high speed disperser with a baghouse	none	none

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: 0121010005 Emissions Unit ID: P095 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.71 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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

II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs), calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

T = total duration of the batch (hrs)

- ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

Ed = (EF) X (W)
 Etot = summation of (Ed)

Where:

Ed = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 Etot = total daily OC emission rate for all batches (lbs)

- b. Emission Limitation:
 Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- c. Emission Limitation:
 Particulate emissions (PE) shall not exceed 0.71 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.0725 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- 2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P095 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P096 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.
2. Additional Terms and Conditions		
a.	Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.	
b.	Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.	

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II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the visible emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.
- The permittee shall record the following on a daily basis:
 - the amount of paint produced (tons);
 - the duration of each batch (hrs);
 - the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - the total daily OC emission rate (lbs), calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

- The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
- The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - an identification of each day during which the average hourly organic compound emission rate for any

batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and

- b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

a. **Emission Limitations:**

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

- i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

T = total duration of the batch (hrs)

- ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

E_{tot} = summation of (E_d)

Where:

E_d = daily OC emission rate for each batch (lbs)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

E_{tot} = total daily OC emission rate for all batches (lbs)

b. **Emission Limitation:**

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

c. **Emission Limitation:**

Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:

Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.1015 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P096 Issuance type: Title V Draft 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	high speed disperser with a baghouse	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: 0121010005 Emissions Unit ID: P097 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;

- c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
- a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs), calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/T$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

$$E_{tot} = \text{summation of } (E_d)$$

Where:
 E_d = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 E_{tot} = total daily OC emission rate for all batches (lbs)
 - b. Emission Limitation:

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

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- c. Emission Limitation:
 - Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
 - Applicable Compliance Method:
 - Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.1015 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).
 - If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- 2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.
 - Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).
 - Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P097 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P099 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule

3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
- a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
- a. Emission Limitations:
Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:
 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this

emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

T = total duration of the batch (hrs)

ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

E_{tot} = summation of (E_d)

Where:

E_d = daily OC emission rate for each batch (lbs)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

E_{tot} = total daily OC emission rate for all batches (lbs)

- b. **Emission Limitation:**
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:**
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
- c. **Emission Limitation:**
Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
- Applicable Compliance Method:**
Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.4050 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).
- If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. **Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.**
- The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P099 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P100 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible

particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

T = total duration of the batch (hrs)

ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

E_{tot} = summation of (E_d)

Where:

E_d = daily OC emission rate for each batch (lbs)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

E_{tot} = total daily OC emission rate for all batches (lbs)

- b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- c. Emission Limitation:

Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:

Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.4050 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum

capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P100 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none

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: 0121010005 Emissions Unit ID: P101 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)] / [T]$$

Where:
 Eh = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

Edot = summation of (Ed)

Where:
 Ed = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 Edot = total daily OC emission rate for all batches (lbs)

- b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
- c. Emission Limitation:
Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
- Applicable Compliance Method:
Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.4050 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).
- If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P101 Issuance type: Title V Draft 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.	high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P102 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	

OAC rule 3745-17-08(B) See A.I.2.a below.

OAC rule 3745-17-07(B) See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitations:
Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
- Applicable Compliance Methods:
- i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:
- $$E_h = [(EF) \times (W)]/T$$
- Where:
E_h = hourly OC emission rate (lb/hr)
EF = emission factor from the latest stack test (lbs OC/ton paint produced)
W = process weight rate for the batch operation (tons)
T = total duration of the batch (hrs)
- ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:
- $$E_d = (EF) \times (W)$$
- $$E_{tot} = \text{summation of } (E_d)$$
- Where:
E_d = daily OC emission rate for each batch (lbs)
EF = emission factor from the latest stack test (lbs OC/ton paint produced)
W = process weight rate for the batch operation (tons)
E_{tot} = total daily OC emission rate for all batches (lbs)
- b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
- c. Emission Limitation:
Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
- Applicable Compliance Method:
Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.4050 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).
- If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P102 Issuance type: Title V Draft 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.	high speed disperser with a baghouse	none	none
	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: 0121010005 Emissions Unit ID: P103 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/T$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

$$E_{tot} = \text{summation of } (E_d)$$

Where:
 E_d = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 E_{tot} = total daily OC emission rate for all batches (lbs)
 - b. Emission Limitation:

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

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
 - c. Emission Limitation:

Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.4050 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2,

and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P103 Issuance type: Title V Draft 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.	high speed disperser with a baghouse	none	none

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: 0121010005 Emissions Unit ID: P104 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 2.24 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/T$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

Etot = summation of (E_d)

Where:

Ed = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 Etot = total daily OC emission rate for all batches (lbs)

- b. Emission Limitation:
 Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
- c. Emission Limitation:
 Particulate emissions (PE) shall not exceed 2.24 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
- Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.4050 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).
- If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P104 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P105 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not

OAC rule 3745-17-11(B)	exceed 8 pounds per hour and 40 pounds per day. Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
OAC rule 3745-17-08(B)	See A.I.2.a below.
OAC rule 3745-17-07(B)	See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs), calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/T$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

Etot = summation of (E_d)

Where:
 E_d = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 Etot = total daily OC emission rate for all batches (lbs)
 - b. Emission Limitation:

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

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
 - c. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.1015 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P105 Issuance type: Title V Draft 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.	high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P106 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);

- c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
- d. the total daily OC emission rate (lbs), calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/T$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

$$E_{tot} = \text{summation of } (E_d)$$

Where:
 E_d = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 E_{tot} = total daily OC emission rate for all batches (lbs)
 - b. Emission Limitation:

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

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
 - c. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.89 pound per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5

lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.1015 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P106 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P107 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 8 pounds per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Methods:

- i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)

ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$Ed = (EF) \times (W)$
 Etot = summation of (Ed)

Where:
 Ed = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 Etot = total daily OC emission rate for all batches (lbs)

b. Emission Limitation:
 Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
 If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

c. Emission Limitation:
 Particulate emissions (PE) shall not exceed 1.41 pounds per hour, based on Table I which is more stringent than the allowable PE rate from Figure II.

Applicable Compliance Method:
 Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.4050 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P107 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P109 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI 01-07324)	Total organic compound emissions shall not exceed 0.895 pound per hour.
		Total organic compound emissions shall not exceed 21.48 pounds per day.
		Total organic compound emissions shall not exceed 3.92 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.0002 pound per hour.
		Particulate emissions from the baghouse stack shall not exceed 0.001 ton per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
		See A.II.2-3 below.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.
2. The emissions unit shall be covered with a vessel lid at all times except when operator access is necessary to add ingredients or take samples.
3. The permittee shall operate the baghouse throughout any addition of pigments to the batch.

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V. 1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.
4. The permittee shall maintain records of the annual hours of operation for this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 0.895 pound per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 21.48 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Total organic compound emissions shall not exceed 0.895 pound per hour, 21.48 pounds per day, and 3.92 tons per year.

Applicable Compliance Methods:

 - i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit and the following equation:

$$E_h = [(EF) \times (W)] / [T]$$

Where:
 E_h = hourly OC emission rate (lb/hr)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 T = total duration of the batch (hrs)
 - ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

$$E_{tot} = \text{summation of } (E_d)$$

Where:
 E_d = daily OC emission rate for each batch (lbs)
 EF = emission factor from the latest stack test (lbs OC/ton paint produced)
 W = process weight rate for the batch operation (tons)
 E_{tot} = total daily OC emission rate for all batches (lbs)
 - iii. Compliance with the annual emission limitation shall be demonstrated by summing the daily OC emission rates for the calendar year and dividing by 2000 lbs/ton.
 - b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions 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).

c. Emission Limitations:

Particulate emissions shall not exceed 0.0002 lb/hr and 0.001 ton per year.

Applicable Compliance Methods:

Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.2315 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual emission limitation shall be demonstrated by multiplying the allowable emission rate of 0.0002 lb of particulates per hour by the actual hours of operation per year, and dividing by 2000 pounds per ton.

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0121010005 Emissions Unit ID: P109 Issuance type: Title V Draft 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.	high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P110 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by

OAC rule 3745-31-05(A)(3)
(PTI 01-07324)

rule.

Total organic compound emissions shall not exceed 0.895 pound per hour.

Total organic compound emissions shall not exceed 21.48 pounds per day.

Total organic compound emissions shall not exceed 3.92 tons per year.

Particulate emissions from the baghouse stack shall not exceed 0.0002 pound per hour.

Particulate emissions from the baghouse stack shall not exceed 0.001 ton per year.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

See A.II.2-3 below.

OAC rule 3745-17-08(B)

See A.I.2.a below.

OAC rule 3745-17-07(B)

See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.
2. The emissions unit shall be covered with a vessel lid at all times except when operator access is necessary to add ingredients or take samples.
3. The permittee shall operate the baghouse throughout any addition of pigments to the batch.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.
4. The permittee shall maintain records of the annual hours of operation for this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of

time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 0.895 pound per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 21.48 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

Total organic compound emissions shall not exceed 0.895 pound per hour, 21.48 pounds per day, and 3.92 tons per year.

Applicable Compliance Methods:

i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

T = total duration of the batch (hrs)

ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

E_{tot} = summation of (E_d)

Where:

E_d = daily OC emission rate for each batch (lbs)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

E_{tot} = total daily OC emission rate for all batches (lbs)

iii. Compliance with the annual emission limitation shall be demonstrated by summing the daily OC emission rates for the calendar year and dividing by 2000 lbs/ton.

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions 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).

c. Emission Limitations:

Particulate emissions shall not exceed 0.0002 lb/hr and 0.001 ton per year.

Applicable Compliance Methods:

Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.2315 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual emission limitation shall be demonstrated by multiplying the allowable emission rate of 0.0002 lb of particulates per hour by the actual hours of operation per year, and dividing by 2000 pounds per ton.

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P110 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P459 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI 01-07324)	Total organic compound emissions shall not exceed 0.895 pound per hour.
		Total organic compound emissions shall not exceed 21.48 pounds per day.
		Total organic compound emissions shall not exceed 3.92 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.001 pound per hour.
		Particulate emissions from the baghouse stack shall not exceed 0.005 ton per year.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

See A.II.2-3 below.

OAC rule 3745-17-08(B)

See A.I.2.a below.

OAC rule 3745-17-07(B)

See A.I.2.b below.

2. Additional Terms and Conditions

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.
2. The emissions unit shall be covered with a vessel lid at all times except when operator access is necessary to add ingredients or take samples.
3. The permittee shall operate the baghouse throughout any addition of pigments to the batch.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.
4. The permittee shall maintain records of the annual hours of operation for this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 0.895 pound per hour, and the actual organic compound emission rate for each such day; and

- b. an identification of each day during which the organic compound emission rate for all batches exceeded 21.48 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

Total organic compound emissions shall not exceed 0.895 pound per hour, 21.48 pounds per day, and 3.92 tons per year.

Applicable Compliance Methods:

i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/[T]$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

T = total duration of the batch (hrs)

ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

E_{tot} = summation of (E_d)

Where:

E_d = daily OC emission rate for each batch (lbs)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

E_{tot} = total daily OC emission rate for all batches (lbs)

iii. Compliance with the annual emission limitation shall be demonstrated by summing the daily OC emission rates for the calendar year and dividing by 2000 lbs/ton.

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions 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).

c. Emission Limitations:

Particulate emissions shall not exceed 0.001 lb/hr and 0.005 ton per year.

Applicable Compliance Methods:

Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.1015 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual emission limitation shall be demonstrated by multiplying the allowable emission rate of 0.001 lb of particulates per hour by the actual hours of operation per year, and dividing by 2000 pounds per ton.

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0121010005 Emissions Unit ID: P459 Issuance type: Title V Draft 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.	high speed disperser with a baghouse	none	none
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: 0121010005 Emissions Unit ID: P460 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI 01-07324)	Total organic compound emissions shall not exceed 0.895 pound per hour.
		Total organic compound emissions shall not exceed 21.48 pounds per day.
		Total organic compound emissions shall not exceed 3.92 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.001 pound per hour.
		Particulate emissions from the baghouse stack shall not exceed 0.005 ton per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-08(B)	See A.II.2-3 below.
	OAC rule 3745-17-07(B)	See A.I.2.a below.
		See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B)

do not apply to this emissions unit.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.
2. The emissions unit shall be covered with a vessel lid at all times except when operator access is necessary to add ingredients or take samples.
3. The permittee shall operate the baghouse throughout any addition of pigments to the batch.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall record the following on a daily basis:
 - a. the amount of paint produced (tons);
 - b. the duration of each batch (hrs);
 - c. the daily and average hourly OC emission rate for each batch (lbs), calculated using the equations specified in A.V.1.a; and
 - d. the total daily OC emission rate (lbs) calculated as the sum of the daily OC emission rates for all batches for each day.
4. The permittee shall maintain records of the annual hours of operation for this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate for any batch exceeded 0.895 pound per hour, and the actual organic compound emission rate for each such day; and
 - b. an identification of each day during which the organic compound emission rate for all batches exceeded 21.48 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Total organic compound emissions shall not exceed 0.895 pound per hour, 21.48 pounds per day, and 3.92 tons per year.

Applicable Compliance Methods:

i. Compliance with the hourly organic compound (OC) emission limitation for each batch may be based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equation:

$$E_h = [(EF) \times (W)]/T$$

Where:

E_h = hourly OC emission rate (lb/hr)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

T = total duration of the batch (hrs)

ii. Compliance with the daily OC emission limitation shall be demonstrated based on the record keeping specified in A.III.3 using the emission factor from the latest stack test for this emissions unit or a similar emissions unit and the following equations:

$$E_d = (EF) \times (W)$$

E_{tot} = summation of (E_d)

Where:

E_d = daily OC emission rate for each batch (lbs)

EF = emission factor from the latest stack test (lbs OC/ton paint produced)

W = process weight rate for the batch operation (tons)

E_{tot} = total daily OC emission rate for all batches (lbs)

iii. Compliance with the annual emission limitation shall be demonstrated by summing the daily OC emission rates for the calendar year and dividing by 2000 lbs/ton.

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions 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).

c. Emission Limitations:

Particulate emissions shall not exceed 0.001 lb/hr and 0.005 ton per year.

Applicable Compliance Methods:

Compliance with the hourly emission limit may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.1015 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

If required, the permittee shall demonstrate compliance by emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual emission limitation shall be demonstrated by multiplying the allowable emission rate of 0.001 lb of particulates per hour by the actual hours of operation per year, and dividing by 2000 pounds per ton.

2. Emission testing shall be conducted within one year of permit issuance and shall be identical to the testing conducted 9/29/93 through 10/6/93. The emission testing shall be used to determine the OC emission factor and determine the hourly OC emission rate from all of the egress points, including 4, 8, 9, 13, DC1-Leg2, and EF2-Leg2, using 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18. The emission egress points tested during the 1993 tests represented all of the stack (dust collector exhaust) and fugitive (local exhaust) emission egress points located at that time in the MOD department of this facility. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the following emissions units are operating at or near their maximum capacities: P109, P110, P459 and P460. Emissions units P093-P107 may also be operating during the emission testing.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0121010005 Emissions Unit ID: P460 Issuance type: Title V Draft 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>
high speed disperser with a baghouse	none	none
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