

Facility ID: 1431070953 Issuance type: Title V Final Permit

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

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

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

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

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

B001 - four gas fired boilers (18.68 MMBtu total);
P004 - abrasive blasting;
P005 - abrasive blasting;
P006 - abrasive blasting;
P007 - abrasive blasting;
P008 - abrasive blasting;
P009 - abrasive blasting; and
P010 - abrasive blasting

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

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: F001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadways and parking areas (see Section A.2.a)	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c, and A.2.e through A.2.i)
unpaved roadways and parking areas (see Section A.2.b)	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.i)

2. Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
 - (a) paved roadways:
 - all
 - paved parking areas:
 - all
- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
 - unpaved roadways:
 - all
 - unpaved parking areas:
 - all
- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies and posting and enforcing a maximum speed limit of 10 miles per hour on the property to ensure compliance. Nothing

in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- f. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- g. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- h. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and each parking area in accordance with the following frequencies:
 - paved roadways and parking areas minimum inspection frequency
 - all daily
 - unpaved roadways and parking areas minimum inspection frequency
 - all daily
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1431070953 Emissions Unit ID: F001 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: K001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

- 1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
interior drum coating line	OAC rule 3745-21-09(B)(6) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See term A.I.2.a. 0.551 lb particulate emissions (PE)/hr Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

2. **Additional Terms and Conditions**

- a. The permittee shall operate a thermal incinerator that provides at least an eighty-one percent reduction, by weight, in the overall VOC emissions from the coating line and that has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

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II. **Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

3. The permittee shall clean and maintain the filters in the capture hood for this coating line on a daily basis. This maintenance shall be performed in such a manner as to ensure proper air flow to the thermal incinerator.
4. The pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air shall be at least 6.7 inches of water.

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III. Monitoring and/or Record Keeping Requirements

1. Thermal Incinerator Temperature Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. Pressure Drop Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a digital monitor which continuously measures and records the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air.

3. Dry Filtration System Record Keeping Requirements:

- a. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- b. The permittee shall maintain daily records indicating what cleaning and maintenance was performed on the filters in the capture hood for this coating line.

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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 incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all times during which the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air does not comply with the pressure drop requirements specified above.
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that cleaning and maintenance was not performed on the filters in the capture hood when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six-months after permit issuance and within six-months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass

emission rate: Methods 1-4, 24, and 25A of 40 CFR Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below.

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

e. 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.)

f. 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.

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

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

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

2. Emission Limitation:
0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

$E = \text{particulate emissions rate (lbs/hr)}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used}$

$CE = \text{fractional control efficiency of the control equipment}$

3. Compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431070953 Emissions Unit ID: K001 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

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

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall

not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: K002 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

- 1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
interior lid coating line	OAC rule 3745-21-09(B)(6) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See term A.1.2.a. 0.551 lb particulate emissions (PE)/hr Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

- 2. **Additional Terms and Conditions**

- a. The permittee shall operate a thermal incinerator that provides at least an eighty-one percent reduction, by weight, in the overall VOC emissions from the coating line and that has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

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II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
3. The permittee shall clean and maintain the filters in the capture hood for this coating line on a daily basis. This maintenance shall be performed in such a manner as to ensure proper air flow to the thermal incinerator.
4. The pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air shall be at least 6.7 inches of water.

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III. Monitoring and/or Record Keeping Requirements

1. Thermal Incinerator Temperature Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. Pressure Drop Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a digital monitor which continuously measures and records the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air.
3. Dry Filtration System Record Keeping Requirements:
 - a. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
 - b. The permittee shall maintain daily records indicating what cleaning and maintenance was performed on the filters in the capture hood for this coating line.

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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 incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all times during which the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air does not comply with the pressure drop requirements specified above.
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that cleaning and maintenance was not performed on the filters in the capture hood when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six-months after permit issuance and within six-months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-4, 24, and 25A of 40 CFR Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below.
 - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. 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.
Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

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

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

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment
3. Compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431070953 Emissions Unit ID: K002 Issuance type: Title V Final Permit

B. State Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: K003 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coating line for the exterior of open head drums	OAC rule 3745-21-09(B)(6)	See term A.I.2.a.
	OAC rule 3745-17-11(B)(1)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

2. **Additional Terms and Conditions**

- a. The permittee shall operate a thermal incinerator that provides at least an eighty-one percent reduction, by weight, in the overall VOC emissions from the coating line and that has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

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- II. **Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
3. The permittee shall clean and maintain the filters in the capture hood for this coating line on a daily basis. This maintenance shall be performed in such a manner as to ensure proper air flow to the thermal incinerator.
4. The pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air shall be at least 6.7 inches of water.

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

1. Thermal Incinerator Temperature Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. Pressure Drop Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a digital monitor which continuously measures and records the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air.

3. Dry Filtration System Record Keeping Requirements:

- a. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- b. The permittee shall maintain daily records indicating what cleaning and maintenance was performed on the filters in the capture hood for this coating line.

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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 incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all times during which the

pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air does not comply with the pressure drop requirements specified above.

3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that cleaning and maintenance was not performed on the filters in the capture hood when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six-months after permit issuance and within six-months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-4, 24, and 25A of 40 CFR Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below.
 - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. 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.
Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

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

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

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment
3. Compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431070953 Emissions Unit ID: K003 Issuance type: Title V Final Permit

B. State Enforceable Section

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

- 1. None.

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

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: K004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coating line for the exterior of closed head drums	OAC rule 3745-21-09(B)(6)	See term A.I.2.a.
	OAC rule 3745-17-11(B)(1)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

2. Additional Terms and Conditions

- a. The permittee shall operate a thermal incinerator that provides at least an eighty-one percent reduction, by weight, in the overall VOC emissions from the coating line and that has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

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II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
3. The permittee shall clean and maintain the filters in the capture hood for this coating line on a daily basis. This maintenance shall be performed in such a manner as to ensure proper air flow to the thermal incinerator.
4. The pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air shall be at least 6.7 inches of water.

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III. Monitoring and/or Record Keeping Requirements

1. Thermal Incinerator Temperature Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. Pressure Drop Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a digital monitor which continuously measures and records the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air.
3. Dry Filtration System Record Keeping Requirements:

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

b. The permittee shall maintain daily records indicating what cleaning and maintenance was performed on the filters in the capture hood for this coating line.

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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 incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all times during which the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air does not comply with the pressure drop requirements specified above.
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that cleaning and maintenance was not performed on the filters in the capture hood when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six-months after permit issuance and within six-months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-4, 24, and 25A of 40 CFR Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below.
 - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. 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.
Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

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

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

2. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

3. Compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431070953 Emissions Unit ID: K004 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

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

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: K005 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
miscellaneous metal parts coating line	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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V. **Testing Requirements**

1. Compliance with the VOC emission limitation shall be determined in accordance with OAC rule 3745-21-10

(B). USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431070953 Emissions Unit ID: K005 Issuance type: Title V Final Permit

B. State Enforceable Section

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

- 1. None.

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

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: K006 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coating line for the exterior of lids	OAC rule 3745-21-09(B)(6) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See term A.I.2.a. 0.551 lb particulate emissions (PE)/hr Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

2. Additional Terms and Conditions

- a. The permittee shall operate a thermal incinerator that provides at least an eighty-one percent reduction, by weight, in the overall VOC emissions from the coating line and that has an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

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II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
3. The permittee shall clean and maintain the filters in the capture hood for this coating line on a daily basis. This maintenance shall be performed in such a manner as to ensure proper air flow to the thermal incinerator.
4. The pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air shall be at least 6.7 inches of water.

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III. Monitoring and/or Record Keeping Requirements

1. Thermal Incinerator Temperature Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. Pressure Drop Monitoring and Record Keeping Requirements:

The permittee shall operate and maintain a digital monitor which continuously measures and records the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air.

3. Dry Filtration System Record Keeping Requirements:
 - a. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
 - b. The permittee shall maintain daily records indicating what cleaning and maintenance was performed on the filters in the capture hood for this coating line.

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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 incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all times during which the pressure drop measured between the exhaust gas stream at the inlet to the thermal incinerator and ambient air does not comply with the pressure drop requirements specified above.
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that cleaning and maintenance was not performed on the filters in the capture hood when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six-months after permit issuance and within six-months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-4, 24, and 25A of 40 CFR Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below.
 - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. 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.
Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air

agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- 2. Emission Limitation:
0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

- 3. Compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431070953 Emissions Unit ID: K006 Issuance type: Title V Final Permit

B. State Enforceable Section

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

- 1. None.

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

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431070953 Emissions Unit ID: N001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

- 1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
drum reclamation furnace with afterburner and scrubber	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. 0.10 lb particulate emissions (PE) per 100 lbs of salvageable material
	OAC rule 3745-17-09(B)	

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. Thermal Incinerator (Afterburner) Operational Restriction:
 - The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit and no greater than 1800 degrees Fahrenheit.
- 2. Scrubber Operational Restrictions:
 - The pressure drop across the scrubber shall be continuously maintained at a value of not less than 43 inches of water at all times while the emissions unit is in operation.
 - The scrubber water flow rate shall be continuously maintained at a value of not less than 95 gallons per minute at all times while the emissions unit is in operation.
 - The pH of the scrubber liquor shall be maintained between 6 and 8 except during times of chemical addition for pH control.
- 3. Furnace Operational Restriction:
 - The steam/water curtains at the tunnel entrance and exit shall be operated at all times that drums are being charged to the furnace.

4. Production Limitation:

The total number of barrels fed to the drum reclamation furnace shall not exceed 290 barrels/hour.

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

1. Thermal Incinerator (Afterburner) Temperature Monitoring and Record Keeping Requirements:

a. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

b. The permittee shall collect and record the following information each day:

i. The average temperature of the exhaust gases from the thermal incinerator during each of the 8, 3-hour blocks of time during the day.

ii. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. Scrubber Monitoring and Record Keeping Requirements:

The permittee shall properly operate and maintain equipment to continuously monitor and record the static pressure drop across the scrubber, the scrubber water flow rate, and the pH of the scrubber liquor while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

a. The pressure drop across the scrubber, in inches of water, on a continuous basis.

b. The scrubber water flow rate, in gallons per minute, on a continuous basis.

c. The pH of the scrubber liquor, on a continuous basis.

3. The permittee shall keep a daily log or record of the operating times for the following:

a. The capture (collection) system.

b. The control device.

c. The monitoring equipment.

d. The associated emissions unit.

4. Steam/Water Curtains Record Keeping Requirements:

The permittee shall maintain daily records that document any time periods when the steam/water curtains at the tunnel entrance and exit were not operated when drums were being charged to the furnace.

5. Production Limit Monitoring and Record Keeping Requirements:

This facility shall maintain hourly records of the number of barrels fed to the furnace.

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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 incinerator did not comply with the temperature limitation specified above.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at the required levels:

a. The static pressure drop across the scrubber.

b. The scrubber water flow rate.

c. The pH of the scrubber liquor.

3. Production Limit Reporting Requirements:

The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the hourly production rate limitation, as well as the corrective actions that were taken to achieve compliance.

4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of

this permit.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the steam/water curtains at the tunnel entrance and exit were not operated when drums were being charged to the furnace. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six-months after permit issuance and within six-months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible emission limitation.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(10).
 - d. The following test method shall be employed to demonstrate compliance with the visible emission limitation: Method 9 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

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

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

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VI. Miscellaneous Requirements

1. This emissions unit shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

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Facility ID: 1431070953 Emissions Unit ID: N001 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2.	Additional Terms and Conditions		
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None