

Facility ID: 0145010101 Issuance type: Draft State Permit To Operate

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

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

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

Facility ID: 0145010101 Emissions Unit ID: K001 Issuance type: Draft State Permit To Operate

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**Part II - Special Terms and Conditions**

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

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
truck axle coating line, with natural gas oven for drying	OAC rule 3745-31-05(A)(3) (PTI 01-3415)	<p>Volatile organic compound (VOC) emissions from all coatings employed in this emissions unit shall not exceed 59.9 lbs/hour.</p> <p>VOC emissions from all cleanup materials employed in this emissions unit shall not exceed 15.45 lbs/hour.</p> <p>The requirements of this rule include compliance with OAC rules 3745-21-09(U)(1)(c), 3745-17-07(A)(1), and 3745-17-11(B).</p>
	OAC rule 3745-35-07	<p>See Section A.2.b below.</p> <p>VOC emissions from all coatings, thinners, and cleanup materials employed in this emissions unit shall not exceed 80.0 tons/rolling, 12-month period.</p> <p>Combined HAP emissions from all coatings, thinners, and cleanup materials employed in this emissions unit shall not exceed 20.0 tons/rolling, 12-month period.</p> <p>Individual HAP emissions from all coatings, thinners, and cleanup materials employed in this emissions unit shall not exceed 5.0 tons/rolling, 12-month period.</p>
	OAC rule 3745-21-09(U)(1)(c)	<p>See Section A.2.a below.</p> <p>The VOC content of any coating employed in this emissions unit shall not exceed 3.5 lbs/gallon, excluding water and exempt solvents.</p>
	OAC rule 3745-17-07(A)(1)	<p>Visible particulate emissions from the outlet stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.</p>
	OAC rule 3745-17-11(B)	<p>Particulate emissions from this emissions unit shall not exceed 9.72 lbs/hour, based on Figure II.</p>

**2. Additional Terms and Conditions**

- (a) The permittee has existing records of the amounts of coating, thinner, and cleanup material employed in this emissions unit during the previous year. Therefore, monthly, accumulating material usage limitations during the first year of operation under this permit are not necessary and the actual emissions, calculated from coating, thinner, and cleanup material usage records from the previous 11 calendar months of operation, shall be used to calculate the rolling, 12-month summation of VOC emissions after the issuance of this permit.
 

The hourly VOC emission limitations specified in A.1 above for this emissions unit were established to reflect the potentials to emit and show compliance with the Ohio EPA Air Toxic Policy. Therefore, it is

not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The maximum amount of annual coating usage for this emissions unit shall not exceed 42,000 gallons, based upon a rolling, 12-month summation of coating usage figures. The maximum annual thinner and cleanup material usage shall not exceed 1,400 gallons, based upon a rolling, 12-month summation of usage figures.
2. The permittee shall vent all the emissions from the coatings through a water curtain or dry filtration system at all times the emissions unit is in operation.

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

1. The permittee shall collect and record the following information for this emissions unit on a monthly basis:
  - a. the name and identification of each coating, thinner, and cleanup material employed;
  - b. the VOC content of each coating employed, excluding water and exempt solvents, as applied, in lbs/gallon;
  - c. the VOC content of each thinner and cleanup material employed, in lbs/gallon;
  - d. the individual HAP content of each coating, thinner, and cleanup material, in lbs/gallon;
  - e. the number of gallons of each coating, thinner, and cleanup material employed;
  - f. the number of gallons of each cleanup material drummed for shipment off site;
  - g. the total VOC emissions from all coatings, thinners and cleanup materials employed, in lbs or tons (i.e., [(for all coatings, the sum of (b) x (e)) + (for all cleanup material, the sum of (c) x (e)) - (for all cleanup materials shipped off site, (c) x (f)) / 2000];
  - h. the total emissions of each individual HAP from all coatings, thinners and cleanup materials employed, in lbs or tons; and
  - i. the total combined HAP emissions from all coatings, thinners, and cleanup materials employed, in lbs or tons.
2. The permittee shall collect and record the following information on a monthly basis for this emissions unit for the purpose of determining compliance with the rolling, 12-month emission and usage limitations:
  - a. the rolling, 12-month summation of coating usage, in gallons;
  - b. the rolling, 12-month summation of thinner and cleanup material usage, in gallons;
  - c. the rolling, 12-month summation of VOC emissions from all coatings, thinners, and cleanup materials, in lbs or tons;
  - d. the rolling, 12-month summation of individual HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons; and
  - e. the rolling, 12-month summation of total combined HAP emissions from all coatings, thinners, and cleanup materials, in lbs or tons.
3. The permittee shall maintain daily records that document any time periods when the water curtain or dry filtration system was not in service and the emissions unit was in operation.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the following limitations for this emissions unit:
  - a. the rolling, 12-month coating usage limitation (42,000 gallons);
  - b. the rolling, 12-month thinner and cleanup material usage limitation (1,400 gallons);
  - c. the rolling, 12-month VOC emission limitation (80.0 tons);
  - d. the rolling, 12-month individual HAP emission limitation (5.0 tons); and
  - e. the rolling, 12-month total combined HAP emission limitation (20.0 tons).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Terms and Conditions of this permit.
2. The permittee shall notify the Ohio EPA, Central District Office in writing of each monthly record showing the use of noncomplying coatings (i.e., VOC contents greater than 3.5 lbs/gallon, excluding water and exempt solvents). Each notification shall include a copy of the record and be submitted to the Ohio EPA, Central District Office within 30 days after the violation occurs.
3. The permittee shall notify the Ohio EPA, Central District Office in writing of each daily record showing that the water curtain or dry filtration system was not in service when the emissions unit was in operation. Each notification shall include a copy of the record and be submitted to the Ohio EPA, Central District Office within 30 days after the violation occurs.

**E. Testing Requirements**

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

VOC emissions from all coatings employed in this emissions unit shall not exceed 59.9 lbs/hour.

**Applicable Compliance Method:**

Compliance with this hourly VOC emission limitation may be demonstrated by multiplying the maximum allowable VOC content of the coating materials (3.5 lbs VOC/gal, excluding water and exempt solvents) by the maximum coating usage rate per hour (17 gallons).

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 18, 25, or 25A, as appropriate.

**Emission Limitation:**

VOC emissions from all cleanup materials employed in this emissions unit shall not exceed 15.45 lbs/hour.

**Applicable Compliance Method:**

Compliance with this hourly VOC emission limitation may be demonstrated by multiplying the maximum VOC content of the cleanup materials (7.34 lbs VOC/gal) by the maximum cleanup material usage rate per hour (2.1 gallons).

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 18, 25, or 25A, as appropriate.

**Emission Limitation:**

The VOC content of any coating employed in this emissions unit shall not exceed 3.5 lbs/gallon, excluding water and exempt solvents.

**Applicable Compliance Method:**

Compliance with the VOC coating content limitation shall be demonstrated through the monthly records required in Section C.1.b above.

**Emission Limitation:**

VOC emissions from all coatings, thinners, and cleanup materials employed in this emissions unit shall not exceed 80.0 tons/rolling, 12-month period.

**Applicable Compliance Method:**

Compliance with this VOC emission limitation shall be demonstrated through the monthly records required in Section C.2.c above.

**Emission Limitations:**

Combined HAP emissions from all coatings, thinners, and cleanup materials employed in this emissions unit shall not exceed 20.0 tons/rolling, 12-month period.

Individual HAP emissions from all coatings, thinners, and cleanup materials employed in this emissions unit shall not exceed 5.0 tons/rolling, 12-month period.

**Applicable Compliance Method:**

Compliance with these HAP emission limitations shall be demonstrated through the monthly records required in Sections C.2.d and C.2.e above.

**Emission Limitation:**

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

**Applicable Compliance Method:**

If required, compliance with this emission limitation 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).

**Emission Limitation:**

Particulate emissions from this emissions unit shall not exceed 9.72 lbs/hour, based on Figure II.

**Applicable Compliance Method:**

Compliance with the hourly particulate emission limitation may be determined by multiplying the maximum density of the coating material employed (11.02 lbs/gal) by the solids content (70.41%, by weight) and the maximum coating usage rate per hour (17 gallons). The result shall be multiplied by the estimated coating transfer efficiency of 40% (i.e., 1-0.4) and the control efficiency rate of the water curtain or dry filtration system of 90% (1-0.9).

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)(10).

2. U.S. EPA Method 24 shall be used to determine the VOC content for coatings and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.
- F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A, B, C, D, E, and F.