

Facility ID: 0247080780 Issuance type: Final 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: 0247080780 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Conveyor and two (2) paint spray booths for repaired metal racks, baskets, and containers. Coatings are air dried.	OAC rule 3745-21-09 (U)(1)(d) OAC rule 3745-35-07	3.5 pounds volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit. See sections A.2.a, B.1, B.2 and B.3 of these terms and conditions.

2. Additional Terms and Conditions

- (a) The emissions from this emissions unit, including emissions from cleanup materials, shall not exceed the following limits:
 - i. 15.0 tons per year of VOC, based upon a rolling, 12-month summation; and
 - ii. 5.62 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.

B. Operational Restrictions

1. The permittee shall operate this emissions unit no more than two hundred sixty (260) days per any 12-month period.
2. The permittee shall not employ more than thirty (30) gallons of coatings per day in this emissions unit.
3. The permittee shall not employ more than eighty (80) gallons of cleanup materials per any 12-month period in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep a daily log of total coating usage for this emissions unit, in gallons per day.
2. The permittee shall keep the following monthly records to ensure compliance with the VOC and HAP emission limits:
For each coating and cleanup material used in this emissions unit:
 - i. The name and identification number of each coating and cleanup material employed;
 - ii. Amount of each coating used, "CT", in gallons per month;
 - iii. Amount of each cleanup material used, "CM", equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons per month;
 - iv. VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating applied (PVGC), in pounds per gallon of coating excluding water and exempt solvents, and in pounds of VOC per gallon of cleanup material used (PVGCM);
 - v. For each coating, the amount of VOC emitted, in pounds per month, to be defined as " CVOC" and calculated as follows:

$$CVOC = CT * PVGC$$

- vi. For each cleanup material, the amount of VOC emitted, in pounds per month, to be defined as "CMVOC" and calculated as follows:

$$\text{CMVOC} = \text{CM} * \text{PVGCM}$$

- vii. The name of all HAPs contained in each coating and cleanup material;

viii. Single HAP content in each coating, in units of pounds of the HAP per gallon of coating, to be defined as "PHGC";

ix. Single HAP content in each cleanup material, in units of pounds of the HAP per gallon of cleanup material, to be defined as "PHGCM";

- x. For each single HAP in each coating, the amount of that HAP emitted in units of pounds per month, to be defined as "PUDH". "PUDH", for each single HAP, shall be calculated as follows:

$$\text{PUDH} = \text{CT} * \text{PHGC}$$

- xi. For each single HAP in each cleanup material, the amount of that HAP emitted in units of pounds per month, to be defined as "PDCM". "PDCM", for each HAP, shall be calculated as follows:

$$\text{PDCM} = \text{CM} * \text{PHGCM}$$

The total amount of VOC emitted (TVOC) from this emissions unit, in tons per month, i.e., the total coating VOC (TDV) plus total cleanup material VOC (TCMVOC), divided by 2000 pounds per ton, and represented by the following equation:

$$\text{TVOC} = (\text{TDV} + \text{TCMVOC}) / (2000 \text{ lbs/ton})$$

Where

TDV = total monthly emissions of VOC from all coatings employed, in pounds, calculated according to the following equation:

TDV = the sum, from $i = 1$ to $i = n$, of $(\text{CVOC})_i$, where

i = subscript denoting an individual coating; and

n = the total number of different coatings employed.

and

TCMVOC = total monthly emissions of VOC from all cleanup materials employed, in pounds, calculated according to the following equation:

TCMVOC = the sum, from $i = 1$ to $i = n$, of $(\text{CMVOC})_i$, where

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed.

For each single HAP, the total amount of that HAP emitted (TSHAP) from this emissions unit, in ton(s) per month, i.e., the total of coating HAP (SHAP) plus total cleanup material HAP (TPDCM), divided by 2000 pounds per ton, and represented by the following equation:

$$\text{TSHAP} = (\text{SHAP} + \text{TPDCM}) / (2000 \text{ lbs/ton})$$

where

SHAP = total monthly emissions for a single HAP from all coatings employed, in pounds, calculated according to the following equation:

SHAP = the sum, from $i = 1$ to $i = n$ of $(\text{PUDH})_i$, where

$(\text{PUDH})_i$ = total monthly emissions of a single HAP from each coating, in pounds;

i = subscript denoting an individual coating; and

n = the total number of different coatings employed that contain the HAP.

and

TPDCM = total monthly emissions for a single HAP in cleanup material, in pounds calculated according to the following equation:

TPDCM = the sum, from $i = 1$ to $i = n$, of $(\text{PDCM})_i$, where

$(\text{PDCM})_i$ = total monthly emissions of a single HAP from each cleanup material, in pounds;

i = subscript denoting an individual cleanup material; and

n = the total number of different cleanup materials employed that contain the HAP.

The rolling, 12-month summation of VOC emissions from emissions unit K001.

The rolling, 12-month summation of the emissions of each HAP from emissions unit K001.

3. The permittee shall keep monthly records of the total gallons of all cleanup materials employed in this emissions unit.
4. The permittee shall keep monthly records of the days of operation and the rolling, 12-month summation of the days of operation for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each month during which the VOC content of any coating employed exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents, and the actual VOC content of each such coating employed for each such time.
 - b. An identification of each day during which the coating usage in this emissions unit exceeded 30 gallons per day, and the actual coating usage for each such day.
 - c. All exceedances of the rolling, 12-month emission limitation for VOC.
 - d. All exceedances of the rolling, 12-month emission limitation for each single HAP.
 - e. All exceedances of the rolling, 12-month limitation on the days of operation.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and

Conditions.

3. The permittee shall submit annual reports which summarize the emissions of VOC and each single HAP from this emissions unit. The reports shall include the emission calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.
4. The permittee shall also submit annual reports which summarize the total gallons of all cleanup materials used in this emissions unit and the total operating days of this emissions unit. The reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitation:

3.5 pounds per gallon of VOC, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.a of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of 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.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

15.0 tons per year of VOC, based upon a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Sections C.2.b and C.2.d of these terms and conditions.

b. Emission Limitation:

5.62 tons per year of each single HAP, based upon a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Sections C.2.c and C.2.e of these terms and conditions. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

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 - F.