

Facility ID: 0278080136 Issuance type: Title V Final Permit

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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 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 - Natural Gas Fired Space Heater, Carrier  
B002 - Natural Gas Fired Space Heater, Dravo  
B004 - Natural Gas Fired Boiler, Paint Line  
B005 - Natural Gas Fired Boiler, Kewenee  
B006 - Natural Gas Fired Space Heater, Carrier  
B007 - Natural Gas Fired Space Heater, Carrier  
B008 - Natural Gas Fired Space Heater, Hastings  
B009 - Natural Gas Fired Space Heater, Hastings  
B011 - Natural Gas Fired Space Heater, Carrier  
B012 - Natural Gas Fired Space Heater, Carrier  
B015 - Natural Gas Fired Space Heater, Dravo  
B016 - Natural Gas Fired Space Heater, Dravo  
B017 - Natural Gas Fired Space Heater, Dravo  
B018 - Natural Gas Fired Space Heater, Dravo  
B019 - Natural Gas Fired Space Heater, Dravo  
B020 - Natural Gas Fired Space Heater, Dravo  
B021 - Natural Gas Fired Space Heater, Dravo  
B022 - Natural Gas Fired Space Heater, Dravo  
B023 - Natural Gas Fired Space Heater, Dravo  
B024 - Natural Gas Fired Space Heater, Dravo  
B026 - Natural Gas Fired Space Heater, Dravo  
B028 - Natural Gas Fired Boiler, Paint Line  
B029 - Natural Gas Fired Boiler, Paint Line  
B030 - Natural Gas Fired Boiler, Paint Line  
B031 - Natural Gas Fired Burner, AVT Drying Oven  
B032 - Natural Gas Fired Boiler, AVT Wet Section  
P005 - Five Stage Pretreatment System  
P006 - AVT Lines, Three Stage Pretreatment and Coater  
T001 - Paint Storage Tank, 10000 Gal. Capacity  
T002 - Paint Storage Tank, 10000 Gal. Capacity  
T003 - Solvent Storage Tank, 6750 Gal. Capacity  
T004 - Solvent Storage Tank, 6750 Gal. Capacity  
Z001 - Wastewater Treatment System, Memtek  
Z002 - Solvent Tanks, AVT Lines  
Z003 - Base Oil Tank, 5700 Gal. Capacity  
Z004 - Waste Oil Tank, 5700 Gal. Capacity  
Z006 - Oxybox on Tension Leveling Line  
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: 0278080136 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>
Prime Coater and Drying Oven	40 CFR Part 60, Subpart TT	See A.I.2.a
	OAC 3745-31-05 PTI No. 02-10805	See A.I.2.b and c
	OAC 3745-21-09 (E)	See A.I.2.d

**2. Additional Terms and Conditions**

- a. The permittee shall not cause to be discharged into the atmosphere more than:(1) 0.14 kg VOC/l (1.17 lb VOC/ gal) of coating solids applied for each calender month for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency ;or (2) 10 percent of the VOC's applied for each calender month (90 percent emission reduction) for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency.The permittee has chosen to comply with the 90 percent emission reduction requirement.
- b. The emissions from emission units K001 and K002 shall not exceed 3245 pounds of VOC per day based on a daily average for each calender month.
- c. The emissions of VOC's from emissions units K001 and K002 shall not exceed 387.8 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- d. The requirements of OAC 3745-21-09(E) are less stringent than the requirements of 40 CFR 60 - Subpart TT.

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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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit or Centigrade. 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 manufacturer's recommendations, with

any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the monthly volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the monthly volume-weighted average VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - e. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - f. 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 that the emissions unit was in compliance.
3. The permittee shall collect and record the following information for the coating line for the purpose of determining monthly VOC emission rates:
  - a. the name and identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the VOC content of each cleanup material, in pounds per gallon;
  - d. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons;
  - e. the total volume of solids from all the coatings employed, in gallons;
  - f. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate from III.2.d times the total volume of solids from all coatings employed in the line), in pounds or tons;
  - g. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons;
  - h. the total days of operation of the coating line each month; and
  - i. the average daily VOC emission rate in pounds of VOC per day. This shall be calculated by dividing (g) by (h) for each month.
4. The permittee shall record the total average daily VOC emissions from emissions units K001 and K002 combined based on an average for each calendar month.
5. The permittee shall record each month the rolling 12-month summation of VOC emissions from emissions units K001 and K002.

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#### IV. Reporting Requirements

1. The permittee shall submit temperature deviation (excursion) reports that identify 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 that the emissions unit was in compliance.
2. The permittee shall submit deviation (excursion) reports which identify all times when the calculated, controlled VOC emission rate from emissions units K001 and K002 exceeded 3245 pounds per day based on a daily average for each calendar month.
3. If the permittee can not meet the 90 percent emission reduction requirement, they shall submit deviation (excursion) reports which identify any month in which the 1.17 pounds VOC per gallon of coating solids applied emission rate is exceeded.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

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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 2 years after permit issuance and within 6 months prior to permit renewal.
  - b. The emission testing shall be conducted to demonstrate compliance with the VOC emission limitations specified in Section A.I.2.a.
  - c. The test(s) 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.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
  - 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 or an approved alternative test protocol. 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.
  - g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast 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(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).  
  
Personnel from the Ohio EPA Northeast District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
2. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office or local air agency within 30 days following completion of the test(s).
  3. Emission Limitation -  
0.14kg VOC/l of coating solids applied or 90 percent emission reduction  
  
Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping specified in Section A.III.2. or testing specified in Section A.V.1.
  4. Emission Limitation -  
3245 pounds of VOC per day based on an average for each calendar month.  
  
Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping specified in Section A.III.3.
  5. Emission Limitation -  
387.8 tons per year VOC based on a rolling 12-month summation of monthly emissions  
  
Applicable Compliance Method:  
Compliance shall be based upon the monthly record keeping requirements specified in Sections A.III.3 and 5 of this permit.
  6. The VOC content of each coating used shall be based upon the use of USEPA Method 24 (for coatings) .

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278080136 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>
Prime Coater and Drying Oven	PTI No. 02-10805 OAC 3745-31-05	see B.I.2.

**2. Additional Terms and Conditions**

- a. The maximum emissions from K001 and K002 in any one day shall not exceed 5000 pounds of VOC per day. This limitation was established in accordance with Ohio EPA's " Air Toxics Policy " and is based on the formulation data and the design parameters of the emissions unit's exhaust system, as specified in the PTI application.

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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. The permittee shall submit deviation (excursion) reports which identify all times when the calculated, controlled VOC emission rate exceeded 5000 pounds per day .

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**V. Testing Requirements**

- 1. Compliance with the emission limitation(s) in Section B.I.2. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation - 5000 pounds of VOC per day
 

Applicable Compliance Method:  
Compliance shall be based upon the monthly record keeping requirements specified in Sections A.III.4 of this permit.

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**VI. Miscellaneous Requirements**

- 1. None

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Facility ID: 0278080136 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>
Finish Coater and Drying Oven	40 CFR Part 60, Subpart TT	See A.I.2.a
	OAC 3745-31-05 PTI No. 02-10805	See A.I.2.b and c
	OAC 3745-21-09 (E)	See A.I.2.d

**2. Additional Terms and Conditions**

- a. The permittee shall not cause to be discharged into the atmosphere more than:(1) 0.14 kg VOC/l (1.17 lb VOC/ gal) of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency ;or (2) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency.The permittee has chosen to comply with the 90 percent emission reduction requirement.
- b. The emissions from emission units K001 and K002 shall not exceed 3245 pounds of VOC per day based on a daily average for each calendar month.
- c. The emissions of VOC's from emissions units K001 and K002 shall not exceed 387.8 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- d. The requirements of OAC 3745-21-09(E) are less stringent than the requirements of 40 CFR 60 - Subpart TT.

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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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit or Centigrade. 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 manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

- c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the monthly volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the monthly volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - e. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - f. 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 that the emissions unit was in compliance.
- 3. The permittee shall collect and record the following information for the coating line for the purpose of determining monthly VOC emission rates:
  - a. the name and identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the VOC content of each cleanup material, in pounds per gallon;
  - d. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons;
  - e. the total volume of solids from all the coatings employed, in gallons;
  - f. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate from III.2.d times the total volume of solids from all coatings employed in the line), in pounds or tons;
  - g. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons;
  - h. the total days of operation of the coating line each month; and
  - i. the average daily VOC emission rate in pounds of VOC per day. This shall be calculated by dividing (g) by (h) for each month.
- 4. The permittee shall record the total average daily VOC emissions from emissions units K001 and K002 combined based on an average for each calendar month.
- 5. The permittee shall record each month the rolling 12-month summation of VOC emissions from emissions units K001 and K002.

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#### IV. Reporting Requirements

- 1. The permittee shall submit temperature deviation (excursion) reports that identify 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 that the emissions unit was in compliance.
- 2. The permittee shall submit deviation (excursion) reports which identify all times when the calculated, controlled VOC emission rate from emissions units K001 and K002 exceeded 3245 pounds per day based on a daily average for each calendar month.
- 3. If the permittee can not meet the 90 percent emission reduction requirement, they shall submit deviation (excursion) reports which identify any month in which the 1.17 pounds VOC per gallon of coating solids applied emission rate is exceeded.
- 4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

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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 2 years after permit issuance and within 6 months prior to permit renewal.
  - b. The emission testing shall be conducted to demonstrate compliance with the VOC emission limitations specified in Section A.1.2.a.

- c. The test(s) 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.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
  - 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 or an approved alternative test protocol. 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.
  - g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast 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(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).  
  
Personnel from the Ohio EPA Northeast District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
2. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office or local air agency within 30 days following completion of the test(s).
  3. Emission Limitation -  
0.14kg VOC/l of coating solids applied or 90 percent emission reduction  
  
Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping specified in Section A.III.2. or testing specified in Section A.V.1.
  4. Emission Limitation -  
3245 pounds of VOC per day based on an average for each calendar month.  
  
Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping specified in Section A.III.3.
  5. Emission Limitation -  
387.8 tons per year VOC based on a rolling 12-month summation of monthly emissions  
  
Applicable Compliance Method:  
Compliance shall be based upon the monthly record keeping requirements specified in Sections A.III.3 and 5 of this permit.
  6. The VOC content of each coating used shall be based upon the use of USEPA Method 24 (for coatings) .

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0278080136 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>
Finish Coater and Drying Oven	PTI No. 02-10805 OAC 3745-31-05	see B.I.2.

**2. Additional Terms and Conditions**

- a. The maximum emissions from K001 and K002 in any one day shall not exceed 5000 pounds of VOC per day. This limitation was established in accordance with Ohio EPA's " Air Toxics Policy " and is based on the formulation data and the design parameters of the emissions unit's exhaust system, as specified in the PTI application.

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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. The permittee shall submit deviation (excursion) reports which identify all times when the calculated, controlled VOC emission rate exceeded 5000 pounds per day .

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**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I.2. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
5000 pounds of VOC per day  
  
Applicable Compliance Method:  
Compliance shall be based upon the monthly record keeping requirements specified in Sections A.III.4 of this permit.

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**VI. Miscellaneous Requirements**

1. None