

Facility ID: 0285010083 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:

Z002 - Grinder 1
Z003 - Grinder 2
Z005 - Grinder 3
Z006 - Grinder 4
Z007 - Welder 1
Z008 - Welder 2
Z009 - Welder 3
Z010 - Welder 4
Z011 - Welder 5
Z012 - Welder 6
Z013 - Welder 7
Z014 - Welder 8
Z015 - Welder 9
Z016 - Welder 10
Z017 - Welder 11
Z018 - Welder 12
Z019 - Welder 13
Z020 - Welder 14
Z021 - Welder 15
Z022 - Welder 16
Z023 - Welder 17
Z024 - Welder 18
Z025 - Welder 19
Z026 - Welder 20
Z027 - Welder 21
Z028 - Welder 22
Z029 - Welder 23
Z030 - Welder 24

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: 0285010083 Emissions Unit ID: R002 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>
Glue Booth	OAC 3745-21-09 (U)(2)(e)(ii)	The permittee shall use less than ten gallons of coating per day.
	OAC 3745-17-07	20% opacity as a six-minute average, except as provided by rule
	OAC 3745-17-11	0.551 pound particulate matter per hour

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 day for the coating line:
 - a. The name and identification number of each coating employed;
 - b. The volume, in gallons, of each coating employed; and
 - c. The total volume, in gallons, of all of the coatings employed.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - Emission Limitation
use less than ten gallons of coating per day
 - Applicable Compliance Method
Compliance shall be based upon record keeping specified in Section A.III. of this permit.
2. Emission Limitation
20% opacity as a six-minute average, except as provided by rule
 - Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.
3. Emission Limitation
0.551 pound particulate matter per hour
 - Applicable Compliance Method
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

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

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

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

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0285010083 Emissions Unit ID: R002 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>
Glue Booth	OAC 3745-31-05 PTI No. 02-10,070	53.6 pounds VOC per day and 10.04 tons VOC per year

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. The permittee shall collect and record the following information each day for the purpose of determining daily and annual VOC emissions:
 - 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 VOC content of each coating, as applied, in pounds per gallon; and
 - e. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily emissions exceed the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the total actual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation
53.6 pounds VOC per day and 10.04 tons VOC per year

Applicable Compliance Method
OAC rule 3745-21-10(B). Formulation data or USEPA Method 24 (for coatings) shall be used to determine the volatile organic compound contents of the coatings and clean up materials. Compliance shall be based upon the record keeping specified in Sections A.III. and B.III. of this permit.

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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: 0285010083 Emissions Unit ID: R003 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>
#1 Paint Booth	OAC 3745-21-09 (I)	3.0 pounds volatile organic compounds (VOC) per gallon coating, less water and exempt solvents See A.I.2.a.
	40 CFR 60 Subpart EE	20% opacity as a six-minute average, except as provided by rule
	OAC 3745-17-07	0.551 pound particulate matter per hour
	OAC 3745-17-11	

2. Additional Terms and Conditions

- a. If the permittee uses less than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and keeps purchase or inventory records or other data necessary to substantiate annual coating usage, the permittee shall be exempt from all other provisions of Subpart EE, 40 CFR 60.313.
- (a) If the permittee uses more than 3,842 liters of metal furniture coatings (as applied) per year, during that year and thereafter the permittee shall emit no more than 0.90 kilogram of VOC per liter of coating solids applied, based on a monthly volume-weighted average.

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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 day for the line:
 - a. The name and identification number of each coating, as applied;
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
- 2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
- 3. If the permittee uses more than 3,842 liters of metal furniture coatings per year, during that year and

thereafter if the permittee uses a non-complying coating during any month, the permittee shall maintain the following monthly records for all the metal furniture coatings:

- a. the identification of each coating;
 - b. the volume of each coating consumed, as received (liters) [B];
 - c. the density of each coating, as received (kilograms per liter) [C];
 - d. the proportion of VOC in each coating, as received (fraction by weight) [D];
 - e. the volume of each VOC-solvent diluent added to each coating (liters) [E];
 - f. the density of each diluent VOC-solvent (kilograms per liter) [F];
 - g. the mass of VOC used during each month [G], i.e.,
 $G = (B_i)(C_i)(D_i) + \dots (B_n)(C_n)(D_n) + (E_i)(F_i) + \dots (E_n)(F_n)$, where :
 n = the total number of surface coatings employed in the emissions unit during the month; and
 i = subscript denoting a specific coating employed;
 - h. the proportion of solids in each coating, as received (fraction by volume) [H];
 - i. the total volume of coating solids used in each calendar month [I]; i.e., $I = (B_i)(H_i) + \dots (B_n)(H_n)$;
 - j. the transfer efficiency (fraction)[J] as specified in Table 1 of 40 CFR 60.313, Subpart EE; and
 - k. the average VOC emissions per unit volume of coating solids applied [K]; i.e. $K = G/(I)(J)$.
4. The permittee shall conduct an initial compliance test for any new metal furniture coatings brought into the facility and used to coat metal furniture. The initial compliance test shall be performed in accordance with the requirements in 40 CFR 60, Subpart EE.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
2. The permittee shall submit an annual report of the amount of metal furniture coatings used during each calendar year. If the permittee uses more than 3,842 liters of coatings (as applied) per year, the permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of this and shall document any exceedances of Subpart EE during that year and any subsequent months. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
3.0 lbs VOC per gallon coating, less water and exempt solvents

Applicable Compliance Method
OAC rule 3745-21-10(B). Formulation data or USEPA Method 24 (for coatings) shall be used to determine the volatile organic compound contents of the coatings. Compliance shall be based upon record keeping specified in Section A.III. of this permit.
 - b. Emission Limitation
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested
 - c. Emission Limitation
0.551 pound particulate matter per hour

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

E = maximum coating solids usage rate (in pounds per hour) X (1-TE) X (1-CE)

E = particulate matter 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 = control efficiency of the control equipment.

d. Emission Limitation

If the permittee uses more than 3,842 liters of coating (as applied) per year, the permittee shall emit no more than 0.90 kilogram of VOC per liter coating solids applied

Applicable Compliance Method

OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for 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 or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Compliance shall be based upon record keeping specified in Section A.III.3. of this permit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0285010083 Emissions Unit ID: R003 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>
#1 Paint Booth	OAC 3745-31-05 PTI No. 02-10,099	6.57 tons VOC per year

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. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

- 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; and
- d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons.

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IV. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the actual total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation
6.57 tons VOC per year

Applicable Compliance Method
OAC rule 3745-21-10(B). Compliance shall be based upon record keeping specified in Section A.III.1. and B.III.1. of this permit.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0285010083 Emissions Unit ID: R004 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>
#2 Paint Booth	OAC 3745-21-09 (I)	3.0 pounds volatile organic compounds (VOC) per gallon coating, less water and exempt solvents
		See A.I.2.a.
	40 CFR 60 Subpart EE	20% opacity as a six-minute average, except as provided by rule
	OAC 3745-17-07	0.551 pound particulate matter per hour
	OAC 3745-17-11	

- 2. **Additional Terms and Conditions**

- a. If the permittee uses less than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and keeps purchase or inventory records or other data necessary to substantiate annual coating usage, the permittee shall be exempt from all other provisions of Subpart EE, 40 CFR 60.313.
- (a) If the permittee uses more than 3,842 liters of metal furniture coatings (as applied) per year, during that year and thereafter the permittee shall emit no more than 0.90 kilogram of VOC per liter of coating solids applied, based on a monthly volume-weighted average.

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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 day for the line:
- The name and identification number of each coating, as applied;
 - The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.
3. If the permittee uses more than 3,842 liters of metal furniture coatings per year, during that year and thereafter if the permittee uses a non-complying coating during any month, the permittee shall maintain the following monthly records for all the metal furniture coatings:
- the identification of each coating;
 - the volume of each coating consumed, as received (liters) [B];
 - the density of each coating, as received (kilograms per liter) [C];
 - the proportion of VOC in each coating, as received (fraction by weight) [D];
 - the volume of each VOC-solvent diluent added to each coating (liters) [E];
 - the density of each diluent VOC-solvent (kilograms per liter) [F];
 - the mass of VOC used during each month [G], i.e.,

$$G = (B_i)(C_i)(D_i) + \dots (B_n)(C_n)(D_n) + (E_i)(F_i) + \dots (E_n)(F_n)$$
, where :
 n = the total number of surface coatings employed in the emissions unit during the month; and
 i = subscript denoting a specific coating employed;
 - the proportion of solids in each coating, as received (fraction by volume) [H];
 - the total volume of coating solids used in each calendar month [I]; i.e., $I = (B_i)(H_i) + \dots (B_n)(H_n)$;
 - the transfer efficiency (fraction)[J] as specified in Table 1 of 40 CFR 60.313, Subpart EE; and
 - the average VOC emissions per unit volume of coating solids applied [K]; i.e. $K = G/(I)(J)$.
4. The permittee shall conduct an initial compliance test for any new metal furniture coatings brought into the facility and used to coat metal furniture. The initial compliance test shall be performed in accordance with the requirements in 40 CFR 60, Subpart EE.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
2. The permittee shall submit an annual report of the amount of coatings used during each calendar year. If the permittee uses more than 3,842 liters of coatings (as applied) per year, the permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of this and shall document any exceedances of Subpart EE during that year and any subsequent years. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
3.0 lbs VOC per gallon coating, less water and exempt solvents

Applicable Compliance Method
OAC rule 3745-21-10(B). Formulation data or USEPA Method 24 (for coatings) shall be used to determine the volatile organic compound contents of the coatings. Compliance shall be based upon record keeping specified in Section A.III. of this permit.
 - b. Emission Limitation
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.
 - c. Emission Limitation
0.551 pound particulate matter per hour

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

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

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

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 = control efficiency of the control equipment
 - d. Emission Limitation
If the permittee uses more than 3,842 liters of coating (as applied) per year, the permittee shall emit no more than 0.90 kilogram of VOC per liter coating solids applied

Applicable Compliance Method
OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for 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 or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Compliance shall be based upon record keeping specified in Section A.III.3. of this permit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0285010083 Emissions Unit ID: R004 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 Paint Booth	OAC 3745-31-05 PTI No. 02-10,100	6.57 tons VOC per year

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. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - 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; and
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons.

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IV. Reporting Requirements

1. The permittee shall also submit annual reports which specify the allowable and actual total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation
6.57 tons VOC per year

Applicable Compliance Method
OAC rule 3745-21-10(B). Compliance shall be based upon record keeping specified in Section A.III.1. and B.III.1. of this permit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0285010083 Emissions Unit ID: R005 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>
Touch-Up Booth	OAC 3745-21-09 (I)	3.0 pounds volatile organic compounds (VOC) per gallon coating, less water and exempt solvents See A.I.2.
	40 CFR 60 Subpart EE	20% opacity as a six-minute average, except as provided by rule
	OAC 3745-17-07	0.551 pound particulate matter per hour
	OAC 3745-17-11	

2. Additional Terms and Conditions

- a. If the permittee uses less than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and keeps purchase or inventory records or other data necessary to substantiate annual coating usage, the permittee shall be exempt from all other provisions of Subpart EE, 40 CFR 60.313.
- (a) If the permittee uses more than 3,842 liters of metal furniture coatings (as applied) per year, during that year and thereafter the permittee shall emit no more than 0.90 kilogram of VOC per liter of coating solids applied, based on a monthly volume-weighted average.

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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 day for the line:
 - a. The name and identification number of each coating, as applied;
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. If the permittee uses more than 3,842 liters of metal furniture coatings per year, during that year and thereafter if the permittee uses a non-complying coating during any month, the permittee shall maintain the following monthly records for all the metal furniture coatings:
 - a. the identification of each coating;
 - b. the volume of each coating consumed, as received (liters) [B];
 - c. the density of each coating, as received (kilograms per liter) [C];
 - d. the proportion of VOC in each coating, as received (fraction by weight) [D];
 - e. the volume of each VOC-solvent diluent added to each coating (liters) [E];
 - f. the density of each diluent VOC-solvent (kilograms per liter) [F];
 - g. the mass of VOC used during each month [G], i.e.,
 $G = (B_i)(C_i)(D_i) + \dots + (B_n)(C_n)(D_n) + (E_i)(F_i) + \dots + (E_n)(F_n)$, where :
 n = the total number of surface coatings employed in the emissions unit during the month; and
 i = subscript denoting a specific coating employed;
 - h. the proportion of solids in each coating, as received (fraction by volume) [H];
 - i. the total volume of coating solids used in each calendar month [I]; i.e., $I = (B_i)(H_i) + \dots + (B_n)(H_n)$;
 - j. the transfer efficiency (fraction)[J] as specified in Table 1 of 40 CFR 60.313, Subpart EE; and
 - k. the average VOC emissions per unit volume of coating solids applied [K]; i.e. $K = G/(I)(J)$.
 4. The permittee shall conduct an initial compliance test for any new metal furniture coatings brought into the facility and used to coat metal furniture. The initial compliance test shall be performed in accordance with the requirements in 40 CFR 60, Subpart EE.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
2. The permittee shall submit an annual report of the amount of coatings used during each calendar year. If the permittee uses more than 3,842 liters of coatings (as applied) per year, the permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of this and shall document any exceedances of Subpart EE during that year and any subsequent years. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
 3.0 lbs VOC per gallon coating, less water and exempt solvents

 Applicable Compliance Method
 OAC rule 3745-21-10(B). Formulation data or USEPA Method 24 (for coatings) shall be used to determine the volatile organic compound contents of the coatings. Compliance shall be based upon record keeping specified in Section A.III. of this permit.
 - b. Emission Limitation

20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.

- c. Emission Limitation
0.551 pound particulate matter per hour

Applicable Compliance Method
To determine the actual worst case emission rate for particulate matter, 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 matter 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 = control efficiency of the control equipment

- d. Emission Limitation
If the permittee uses more than 3,842 liters of coating (as applied) per year, the permittee shall emit no more than 0.90 kilogram of VOC per liter coating solids applied

Applicable Compliance Method
OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for 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 or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Compliance shall be based upon record keeping specified in Section A.III.3. of this permit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0285010083 Emissions Unit ID: R005 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>
Touch-Up Booth	OAC 3745-31-05 PTI No. 02-10,398	3.33 tons VOC per year

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. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - 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; and
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons.

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IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the actual total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation
3.33 tons VOC per year

Applicable Compliance Method
OAC rule 3745-21-10(B). Compliance shall be based upon record keeping specified in Section A.III.1. and B.III.1. of this permit.

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VI. Miscellaneous Requirements

1. None