

Facility ID: 0372030199 Issuance type: Title V Preliminary Proposed 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. This facility is subject to 40 CFR, Part 63, Subpart PPPP--National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (see attached).

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:
Cleaver-Brooks 150 hp Boiler (B001); Binks Oven #79 (P003); Paint Suppliers Lab (R001); Design Studio (R004); Blow Mold #1 (Z001); Blow Mold #2 (Z002); Blow Mold #3 (Z003); Blow Mold #4 (Z004); Blow Mold #5 (Z005); Blow Mold #6 (Z006); Robot Room #1 (Z007); Robot Room #2 (Z008); Robot Room #3 (Z009); Robot Room #4 (R010); Post-Op Rework (Z011); Assembly and Post-Op Rework (Z012); Paint Line #3 Paint/Waste Storage (Z014); Paint Line #3 Paint and Solvent Storage Area (Z015); Paint Line #3 Air Makeup Unit #851 (Z016); Paint Line #3 Air Makeup Unit #852 (Z017); Paint Line #3 Air Makeup Unit #853 (Z018); Paint Line #4 Air Makeup Unit Primer Booth (Z019); Paint Line #4 Air Makeup Unit Color Booth (Z020); Paint Line #4 Air Makeup Unit Clear Booth (Z021); Propane Vaporizer (Z043); Post-Op Rework Vacuum System (Z044); Blow Mold Natural Gas Material Dryer (Z045); Glue Machine & Booth (Z046); Storage Silo #1 (Z047); Storage Silo #2 (Z048); Storage Silo #3 (Z049); Storage Silo #4 (Z050); Storage Silo #5 (Z051); Storage Silo #6 (Z052); Storage Silo #7 (Z053); Storage Silo #8 (Z054); Blow Molding Machines - Robotic Sanders (Z056); Dual Head Blow Molding Machine (Z059); Vacuum Pump Blow Mold Pellet Delivery System (Z060); Electric Curing Oven (Z062); and Paint Supplier Lab Electric Curing Oven (Z063).
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 PTI for the unit.

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- [Go to Part III for Emissions Unit P018](#)
- [Go to Part III for Emissions Unit P019](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0372030199 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed 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>
paint line #4 with water curtain	OAC rule 3745-31-05 (A)(3) (PTI #03-13836)	127.50 lbs organic compounds (OC)/hr, including cleanup materials 301.2 tons OC/yr, including cleanup materials 117.00 lbs volatile organic compounds (VOC)/hr, including cleanup materials 6.10 lbs particulate emissions (PE)/hr 14.5 tons PE/yr Visible PE shall not exceed 0% opacity, as a six-minute average. See A.I.2.b. and A.I.2.c.
	OAC rule 3745-31-05 (D) PTI #03-13836	277.8 tons VOC per rolling, 365-day period (See A.I.2.e.)
	OAC rule 3745-21-07 (G)	See A.II.1.
	OAC rule 3745-21-07 (G)(1)	3 lbs/hr and 15 lbs/day OC emissions (See A.I.2.e.)
	OAC rule 3745-17-07 (A)	See A.I.2.f.
	OAC rule 3745-17-10 (B)	0.020 lb PE/mmBtu of actual heat input (from the ovens associated with this emissions unit)
	OAC rule 3745-17-11 (B)	See A.I.2.f.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.h.

2. Additional Terms and Conditions

- a. This emissions unit consists of the following operations:
 - (a)
 - a. paint mixing operation;
 - b. primer spray booth with water curtain;
 - c. indirect-fired primer curing oven;
 - d. color spray booth with water curtain;

- e. clearcoat spray booth with water curtain;
 - f. indirect-fired clearcoat curing oven; and
 - g. paint cleanup operation.
- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-21-07(G) [for the coating operations), 3745-21-07(G)(1) [for the ovens associated with this emissions unit), 3745-21-08(B), 3745-23-06(B) and 3745-17-10 (B).
- c. All PE are assumed to be particulate matter less than 10 microns in size (PM10).
- d. The permittee has requested a federally enforceable emission limitation for this emissions unit of 277.8 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. This emissions unit (paint Line #4) is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emission restrictions for the first year of operation.
- e. Based on previous stack testing, it has been determined that each cure oven contributes less than 0.625 pound OC/hour to an overall hourly emission rate of 127.50 pounds for the entire paint line #4. Based on the maximum potential hourly contribution of each cure oven to the overall hourly emission rate, each cure oven is in compliance with the 3 pounds OC/hour and 15 pounds OC/day emission limitations specified in OAC rule 3745-21-07 (G)(1). Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with the 3 lbs/hr and 15 lbs/day of OC emissions for the ovens.
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- g. There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because natural gas is the only fuel burned in this emissions unit.
- h. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-13836.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01 (C)(5), is prohibited.
2. The permittee shall operate the water curtain system(s) whenever the paint booth(s) associated with this emissions unit is/are in operation.
3. The permittee shall only coat non-metal parts in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The company identification for each liquid organic material employed.
 - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
 - c. The type of each part coated (i.e., metal, or non-metal).
2. The permittee shall maintain daily records that document any time periods when the water curtain system(s) was/were not in service when the paint booth(s) associated with this emissions unit was/were in operation.
3. The permittee shall collect and record the following information for each day for OC and VOC emissions for this emissions unit:
 - a. The company identification for each coating and cleanup material employed.

- b. The number of gallons of each coating and cleanup material employed.
- c. The VOC and OC contents of each coating and cleanup material employed, in pounds per gallon.
- d. The VOC and OC emission rates for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings and cleanup materials].
- e. The total number of hours the emissions unit was in operation.
- f. The average, hourly VOC and OC emission rates for all the coatings and cleanup materials (d/e), in pounds per hour (average).
- g. The annual, year-to-date OC emission rate, in tons, for all the coatings and cleanup materials (summation of A.III.3.d for OC for each calendar day to date from January to December).
- h. The annual emissions of VOC, in tons, based on a rolling, 365-day summation of the daily VOC emission rates.
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
4. The permittee shall collect and record the following information for each day for this emissions unit:
- a. The company identification for each coating employed.
- b. The number of gallons of each coating employed.
- c. The solids content of each coating employed, in pounds per gallon.
- d. The total coating solids usage rate for all the coatings employed, in pounds [summation of (b x c) for all coatings].
- e. The PE rate for all the coatings employed, in pounds, calculated as follows:
- $$E = \text{PE rate (lbs/day)}$$
- $$E = (\text{coating solid usage rate [from section A.III.4.d.]} \times (1 - \text{TE}) \times (1 - \text{CE}))$$
- where,
- 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 (assumed to be 15 percent)
- CE = control efficiency of the control equipment (assumed to be 90 percent)
- f. The total number of hours the emissions unit was in operation.
- g. The average hourly PE rate for all the coatings employed (e/f), in pounds per hour (average).
- h. The annual, year-to-date PE rate, in tons, for all the coatings employed (summation of A.III.4.e for each calendar day to date from January to December).

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water curtain system(s) was/were not in service when the paint booth(s) associated with this emissions unit was/were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.I.c. of the Part 1 - General Terms and Conditions of this permit, that identify each day during which the following average hourly emission limitations were exceeded:
 - a. 127.50 pounds OC;
 - b. 117.00 pounds VOC; and/or
 - c. 6.10 pounds PE.

The permittee shall include in the report the actual average hourly emissions for each such day.
4. The permittee shall submit annual reports that summarize the actual annual PE and VOC and OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.I.c. of the

Part 1 - General Terms and Conditions of this permit, that identify all exceedances of the rolling, 365-day VOC emission limitation of 277.8 tons.

6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the coating of any metal part in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

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V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
127.50 lbs OC/hr and 301.2 tons OC/yr

Applicable Compliance Method:
The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the hourly and annual OC emission limitations above.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitations:
6.10 lbs PE/hr and 14.5 tons PE/yr

Applicable Compliance Method:
The record keeping requirements established pursuant to Section A.III.4 of this permit shall be used to determine compliance with the hourly and annual PE limitations above.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.
 - c. Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.
 - d. Emission Limitations:
117.00 lbs VOC/hr and 277.8 tons VOC per rolling, 365-day period

Applicable Compliance Method:
The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations above.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - e. Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the PE limitation above by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr)

If required, compliance with this emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).
 - f. Emission Limitations:
3 lbs/hr and 15 lbs/day OC (for the ovens associated with this emissions unit)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly OC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The permittee may demonstrate compliance with the daily OC emission limitation by multiplying the hourly tested OC emission limitation by 24.
2. The permittee shall conduct, or have conducted, emission testing for the ovens associated this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior

to permit expiration.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable OC mass emission rates of 3 lbs/hr and 15 lbs/day.
 - c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
3. 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, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units 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, Northwest District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.
- A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
4. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. Paint Line #4 was originally permitted as emissions units P004, P005, R006, R007, and R008 under PTI #03-8365, issued 6/5/96.

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Facility ID: 0372030199 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed 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>
paint line #4 with water curtain	none	none
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 permit to install for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

Air Toxic: Ethylbenzene
TLV (mg/m3): 434.73
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Styrene
TLV (mg/m3): 85.20
MAGLC (ug/m3): 2028.63
Maximum 1-Hour Average Concentration (ug/m3): 1.66

Air Toxic: Methyl Propyl Ketone
TLV (mg/m3): 704.87
MAGLC (ug/m3): 16782.55
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Isobutyl Ketone
TLV (mg/m3): 204.83
MAGLC (ug/m3): 4876.81
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Mesithylene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Diisobutyl Ketone
TLV (mg/m3): 145.43
MAGLC (ug/m3): 3462.61
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Toluene
TLV (mg/m3): 188.40
MAGLC (ug/m3): 4485.83
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ketoheptamethylene (Cyclohexanone)
TLV (mg/m3): 96.30
MAGLC (ug/m3): 2292.82
Maximum 1-Hour Average Concentration (ug/m3): 126.90

Air Toxic: Isobutyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58
Air Toxic: Methyl Amyl Ketone
TLV (mg/m3): 233.50
MAGLC (ug/m3): 5559.45
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isoamyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Xylene
TLV (mg/m3): 434.19
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Acetate
TLV (mg/m3): 1441.31
MAGLC (ug/m3): 34316.88
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Heptane
TLV (mg/m3): 1639.26
MAGLC (ug/m3): 39030.09

Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Trimethylbenzene
 TLV (mg/m3): 122.89
 MAGLC (ug/m3): 2926.04
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Amyl Acetate
 TLV (mg/m3): 266.26
 MAGLC (ug/m3): 6339.47
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Alcohol
 TLV (mg/m3): 1884.25
 MAGLC (ug/m3): 44863.18
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Alcohol
 TLV (mg/m3): 262.09
 MAGLC (ug/m3): 6240.14
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropyl Alcohol
 TLV (mg/m3): 983.07
 MAGLC (ug/m3): 23406.37
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Alcohol
 TLV (mg/m3): 151.57
 MAGLC (ug/m3): 3608.92
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isobutyl Alcohol
 TLV (mg/m3): 151.57
 MAGLC (ug/m3): 3608.92
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58
 Air Toxic: Methyl Ethyl Ketone
 TLV (mg/m3): 589.78
 MAGLC (ug/m3): 14042.26
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Stoddard Solvent
 TLV (mg/m3): 572.60
 MAGLC (ug/m3): 13633.27
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Hexamethylene Diisocyanate
 TLV (mg/m3): 0.03
 MAGLC (ug/m3): 0.82
 Maximum 1-Hour Average Concentration (ug/m3): 0.81

Air Toxic: 1,2,4-Trimethylbenzene
 TLV (mg/m3): 122.89
 MAGLC (ug/m3): 2926.04
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropylbenzene
 TLV (mg/m3): 245.79
 MAGLC (ug/m3): 5852.08
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to

determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0372030199 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed 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>
paint engineering lab with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-13836)	26.40 lbs organic compounds (OC)/day, including cleanup materials
		3.4 tons OC/yr, including cleanup materials
		23.52 lbs volatile organic compounds (VOC)/day, including cleanup materials
		0.04 lb particulate emissions (PE)/hr 0.1 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a and A.I.2.b.
	OAC rule 3745-31-05 (D) (PTI #03-13836)	3.1 tons VOC per rolling, 365-day period (See A.I.2.c.)
	OAC rule 3745-21-07 (G)	See A.II.1.

OAC rule 3745-17-07 (A) See A.I.2.e.
OAC rule 3745-17-11 (B) See A.I.2.e.

2. **Additional Terms and Conditions**

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D) and 3745-21-07(G).
- b. All PE are assumed to be particulate matter less than 10 microns in size (PM10).
- c. The permittee has requested a federally enforceable emission limitation for the paint blending operation of 3.1 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

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II. **Operational Restrictions**

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01 (C)(5), is prohibited.
2. The permittee shall operate the dry filtration system whenever the unit is in operation.
3. The annual VOC emissions for this emissions unit shall not exceed 3.1 tons based upon a rolling, 365-day summation of the daily VOC emission rates.

To ensure federal enforceability during the first 365-calendar days of operation after issuance of PTI #03-13836, the permittee shall not exceed the following VOC emission rates:

Month(s) VOC Emissions

1-1 0.3
1-2 0.6
1-3 0.9
1-4 1.2
1-5 1.5
1-6 1.8
1-7 2.1
1-8 2.3
1-9 2.5
1-10 2.7
1-11 2.9
1-12 3.1

After the first 12 calendar months of operation after issuance of PTI #03-13836, compliance with the annual VOC emission limitation of 3.1 tons shall be based upon a rolling, 365-day summation of the daily VOC emission rates.

4. The permittee shall only coat non-metal parts in this emissions unit.

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

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The company identification for each liquid organic material employed.
 - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
 - c. The type of each part coated (i.e., metal, or non-metal).
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when this emission unit was in operation.
3. The permittee shall collect and record the following information for each day for OC and VOC emissions for this emissions unit:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC and OC contents of each coating and cleanup material employed, in pounds per gallon.
 - d. The VOC and OC emission rates for all the coatings and cleanup materials employed, in pounds [summation of (b x c), for all coatings and cleanup materials].
 - e. The annual, year-to-date OC emission rate, in tons, for all the coatings and cleanup materials

(summation of A.III.3.d for OC for each calendar day to date from January to December).

f. After the first 12 calendar months of operation after issuance of PTI #03-13836, the annual emissions of VOC, in tons, based on a rolling, 365-day summation of the daily VOC emission rates.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The solids content of each coating employed, in pounds per gallon.
 - d. The total coating solids usage rate for all the coatings employed, in pounds [summation of (b x c) for all coatings].
 - e. The PE rate for all the coatings employed, in pounds, calculated as follows:

$$E = \text{PE rate (lbs/day)}$$

$$E = (\text{coating solid usage rate [from section A.III.4.d.]}) \times (1 - \text{TE}) \times (1 - \text{CE})$$
 where,

$$\text{TE} = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 15 percent)}$$

$$\text{CE} = \text{control efficiency of the control equipment (assumed to be 90 percent)}$$
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly PE rate for all the coatings employed (e/f), in pounds per hour (average).
 - h. The annual, year-to-date PE rate, in tons, for all the coatings employed (summation of A.III.4.e for each calendar day to date from January to December).
5. For the first 12 calendar months of operation after issuance of PTI #03-13836, the permittee shall collect and record the following information for each month for the VOC emissions for this emissions unit:
 - a. The VOC emission rates for all the coatings and cleanup materials employed, in pounds [calculated by summing the daily VOC emission rates, from section A.III.3.d above, for the calendar month].
 - b. The monthly accumulative VOC emissions, in tons.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports, in accordance with paragraph A.I.c. of the Part 1 - General Terms and Conditions of this permit, that identify all exceedances of the following:
 - a. the daily OC emission limitation of 26.40 pounds;
 - b. the daily VOC emission limitation of 23.52 pounds; and/or
 - c. the hourly average PE limitation of 0.04 pound.

The permittee shall include in the report the actual emissions for each such day/hour.
4. The permittee shall submit annual reports that summarize the actual annual PE and VOC and OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. For the first 12 calendar months of operation after issuance of PTI #03-13836, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the maximum allowable VOC emission rates specified in Section A.II.3 of this permit.
6. After the first 12 calendar months of operation after issuance of PTI #03-13836, the permittee shall submit deviation (excursion) reports, in accordance with paragraph A.I.c. of the Part 1 - General Terms and Conditions of this permit, that identify all exceedances of the rolling, 365-day VOC emission limitation of 3.1 tons.

7. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the coating of any metal part in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
26.40 lbs OC/day and 3.4 tons OC/yr

Applicable Compliance Method:
The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the daily and annual OC emission limitations above.
 - b. Emission Limitations:
23.52 lb VOC/hr and 3.1 tons VOC per rolling, 365-day period

Applicable Compliance Method:
The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations above.
 - c. Emission Limitations:
0.04 lb PE/hr and 0.1 ton PE/yr

Applicable Compliance Method:
The record keeping requirements established pursuant to Section A.III.4 of this permit shall be used to determine compliance with the hourly and annual PE limitations above.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.
 - d. Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.
 - e. Emission Limitation:
for the first 12-calendar months of operation, the monthly accumulative VOC emission rates

Applicable Compliance Method:
The record keeping requirements established pursuant to Sections A.III.3 and 5 of this permit shall be used to determine compliance with the VOC emission limitations above.
2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed 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>
paint engineering lab with dry filtration	none	none
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 permit to install for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

Air Toxic: Ethylbenzene
 TLV (mg/m3): 434.73
 MAGLC (ug/m3): 10337.91
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Styrene
 TLV (mg/m3): 85.20
 MAGLC (ug/m3): 2028.63
 Maximum 1-Hour Average Concentration (ug/m3): 1.66

Air Toxic: Methyl Propyl Ketone
 TLV (mg/m3): 704.87
 MAGLC (ug/m3): 16782.55
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Isobutyl Ketone
 TLV (mg/m3): 204.83
 MAGLC (ug/m3): 4876.81
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Mesithylene
 TLV (mg/m3): 122.89
 MAGLC (ug/m3): 2926.04
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Diisobutyl Ketone
 TLV (mg/m3): 145.43
 MAGLC (ug/m3): 3462.61
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Toluene
 TLV (mg/m3): 188.40
 MAGLC (ug/m3): 4485.83
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ketoheptamethylene (Cyclohexanone)
 TLV (mg/m3): 96.30
 MAGLC (ug/m3): 2292.82
 Maximum 1-Hour Average Concentration (ug/m3): 126.90

Air Toxic: Isobutyl Acetate
 TLV (mg/m3): 712.64
 MAGLC (ug/m3): 16967.57
 Maximum 1-Hour Average Concentration (ug/m3): 2293.58
 Air Toxic: Methyl Amyl Ketone
 TLV (mg/m3): 233.50
 MAGLC (ug/m3): 5559.45

Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isoamyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Xylene
TLV (mg/m3): 434.19
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Acetate
TLV (mg/m3): 1441.31
MAGLC (ug/m3): 34316.88
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Heptane
TLV (mg/m3): 1639.26
MAGLC (ug/m3): 39030.09
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Amyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Alcohol
TLV (mg/m3): 1884.25
MAGLC (ug/m3): 44863.18
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Alcohol
TLV (mg/m3): 262.09
MAGLC (ug/m3): 6240.14
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropyl Alcohol
TLV (mg/m3): 983.07
MAGLC (ug/m3): 23406.37
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isobutyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Ethyl Ketone
TLV (mg/m3): 589.78
MAGLC (ug/m3): 14042.26
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Stoddard Solvent
TLV (mg/m3): 572.60
MAGLC (ug/m3): 13633.27
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Hexamethylene Diisocyanate
TLV (mg/m3): 0.03
MAGLC (ug/m3): 0.82
Maximum 1-Hour Average Concentration (ug/m3): 0.81

Air Toxic: 1,2,4-Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropylbenzene
TLV (mg/m3): 245.79
MAGLC (ug/m3): 5852.08
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0372030199 Emissions Unit ID: P008 Issuance type: Title V Preliminary Proposed 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>
clear cure oven with regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10891)	0.38 lb organic compounds (OC)/hr 1.51 tons OC/yr combustion emissions from the RTO: 0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a) combustion emissions from the oven: 0.57 lb NOx/hr 2.29 tons NOx/yr See A.I.2.b. and A.I.2.c. See A.I.2.d. See A.I.2.f.
	OAC rule 3745-21-07 (G)(1)	
	OAC rules 3745-21-08 (B) and 3745-23-06 (B)	
	OAC rule 3745-17-10 (B)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions

- a. Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- b. Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08 (B), 3745-23-06 (B), 3745-17-10 (B) and 3745-17-07 (A).
- d. The emission limits/control requirements specified by this rule are less stringent than the emission limits/control requirements established pursuant to OAC rule 3745-31-05 (A)(3).
- e. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booths (R011 and R018), the permittee shall utilize a value of 98 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 2 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon emission testing conducted by the permittee. The "split" of OC emissions between this emissions unit and the associated spray booths shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- f. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-10891.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- g. There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because natural gas is the only fuel burned in this emissions unit.

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II. Operational Restrictions

- 1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;

- b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
 3. The average combustion temperature within the RTO, 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.
 4. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

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III. Monitoring and/or Record Keeping Requirements

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

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total potential uncontrolled OC emissions for the spray booths associated with this emissions unit (Section A.III.4.d of emissions unit R011 + Section A.III.4.d of emissions unit R018), in pounds;
 - b. the total potential OC emission rate, in pounds, calculated by multiplying A.III.3.a by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit), in pounds;
 - c. the total controlled OC emission rate, in pounds, calculated by multiplying A.III.3.b by (1 - the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance); and
 - d. the number of hours the emissions unit was operation;
 - e. the average hourly controlled OC emission rate, i.e., (c)/(d), in pounds per hour (average).
4. The permittee shall collect and record each year the following information for this emissions unit:
 - a. the total controlled OC emission rate, in tons, calculated by summing the daily OC emission rates, from Section A.III.3.c, for the calendar year, and dividing by 2000; and
 - b. the total number of hours the emissions unit was in operation, calculated by summing the daily numbers of hours of operation, from Section A.III.3.d, for the calendar year.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the

emissions units were in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and

- b. all exceedances of the hourly OC emission limitation of 0.38 pound.
2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitations:
0.38 lb OC/hr and 1.51 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.3 of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements established in Sections A.III.3 and A.III.4 of this permit.

- b. Emission Limitations:
0.62 lb NOx/hr and 2.73 TPY NOx, from the RTO

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NOx limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- c. Emission Limitations:
0.57 lb NOx/hr and 2.29 tons NOx/yr, from the oven

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the oven (6.0 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual NOx emission limitation was established by multiplying the hourly NOx emission limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and with the restriction on the annual number of hours of operation, compliance shall also be shown with the annual emission limitation.

- d. Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OC

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2. of this permit.

- e. Emission Limitation:
8,030 hours of operation/yr

Applicable Compliance Method:

Compliance with the annual restriction on the number of hours of operation shall be determined by the

record keeping requirements specified in Sections A.III.3. and A.III.4. of this permit.

2. 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 3 months after permit issuance and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiency requirements for OC, and to determine the oven/booth split as defined in section A.I.2.e of this permit.
 - c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
 - 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.) 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 the 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.
3. 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, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: P008 Issuance type: Title V Preliminary Proposed 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</u>
---	--------------------------------------	---

- | | | | |
|--|---|------|-------------------------|
| | clear cure oven with regenerative thermal oxidizer (RTO); paint line #3 | none | <u>Measures</u>
none |
|--|---|------|-------------------------|
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 permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00
- Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00
- Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00
- Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00
- Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00
- OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0372030199 Emissions Unit ID: P018 Issuance type: Title V Preliminary Proposed 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>
paint mix operations with regenerative thermal oxidizer (RTO); paint line #3.	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	0.37 lb organic compounds (OC)/hr, 0.33 ton OC/yr combustion emissions from the RTO: 0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.) See A.I.2.b.

2. Additional Terms and Conditions

- a. Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission

limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.

- b. Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- c. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) based upon the decision by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

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II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, 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 that measures and records the combustion temperature within the RTO whenever this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

 - a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating mixed;
 - b. the number of hours this emissions unit was in operation;
 - c. the number of gallons of each coating mixed;
 - d. the OC content of each coating mixed, in pounds per gallon;
 - e. the total uncontrolled OC emission rate for all the coatings mixed [(summation of (c x d) for all the coatings) x 0.01*], in pounds;
 - f. the total controlled OC emission rate for all the coatings mixed [A.III.3.e x (1 - the overall control efficiency

from the most recent performance test that demonstrated the emissions unit was in compliance)]; and

g. the average hourly OC emission rate for all the coatings mixed [A.III.3.f/A.III.3.b], in pounds per hour (average).

* it is assumed that 1%, by weight, of the solvents in the coatings mixed evaporates

4. The permittee shall collect and record each year the total OC emission rate for this emissions unit, in tons, calculated by summing the daily OC emission rates, from Section A.III.3.f, for the calendar year, and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 0.37 pound.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the actual annual OC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
0.37 lb OC/hr and 0.33 ton OC/yr

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above based upon the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A and the record keeping requirements established in Section A.III.3. of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in sections A.III.3. and A.III.4. of this permit.
 - b. Emission Limitations:
0.62 lb NOx/hr and 2.73 TPY NOx, from the RTO

Applicable Compliance Method:
Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NOx limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
 - c. Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OC

Applicable Compliance Method:
Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.
2. 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 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass

emission rate and the capture and control efficiency requirements for OC.

c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the OC allowable mass emission rate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

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.) 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 the 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 int

3. 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, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

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

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: P018 Issuance type: Title V Preliminary Proposed 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>
paint mix operations with regenerative thermal oxidizer (RTO); paint line #3.	none	none

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 permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl benzene
 TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.37
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
 TLV (ug/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 2.54
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 14,048.00

Pollutant: xylene
 TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.06
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: toluene
 TLV (ug/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.26
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 4,476.00

Pollutant: methanol
 TLV (ug/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.01
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 6,238.00
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0372030199 Emissions Unit ID: P019 Issuance type: Title V Preliminary Proposed 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>
primer oven with cooling zone and regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10891)	0.37 lb organic compounds (OC)/hr, 1.48 tons OC/yr
		combustion emissions from the RTO:
		0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a)
		combustion emissions from the oven:
		0.15 lb NOx/hr 0.61 ton NOx/yr
		See A.I.2.b. and A.I.2.c.
	OAC rule 3745-21-07 (G)(1)	See A.I.2.d.
	OAC rules 3745-21-08 (B) and 3745-23-06 (B)	See A.I.2.f.
	OAC rule 3745-17-10 (B)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions

- a. Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- b. Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08 (B), 3745-23-06 (B), 3745-17-10 (B) and 3745-17-07 (A).
- d. The emission limits/control requirements specified by this rule are less stringent than the emission limits/control requirements established pursuant to OAC rule 3745-31-05 (A)(3).
- e. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R009), the permittee shall utilize a value of 98 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 2 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon emission testing conducted by the permittee. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- f. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-10891.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- g. There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because natural gas is the only fuel burned in this emissions unit.

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II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, 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.
4. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

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III. Monitoring and/or Record Keeping Requirements

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

necessary by the permittee.

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
- a. the total potential uncontrolled OC emissions for the spray booths associated with this emissions unit (from Section A.III.4.d of emissions unit R009), in pounds;
 - b. the total potential OC emission rate, in pounds, calculated by multiplying A.III.3.a by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit), in pounds;
 - c. the total controlled OC emission rate, in pounds, calculated by multiplying A.III.3.b by (1 - the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance); and
 - d. the number of hours of operation;
 - e. the average hourly controlled OC emission rate, i.e., (c)/(d), in pounds per hour (average).
4. The permittee shall collect and record each year the following information for this emissions unit:
- a. the total controlled OC emission rate, in tons, calculated by summing the daily OC emission rates, from Section A.III.3.c, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.3.d, for the calendar year.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions units were in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and
 - b. all exceedances of the hourly OC emission limitation of 0.37 pound.
2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
0.37 lb OC/hr and 1.48 tons OC/yr

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation shall be determined by emission testing

- conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.3. of this permit.
- Compliance with the annual limitation shall be determined by the record keeping requirements established in Sections A.III.3. and A.III.4. of this permit.
- b. Emission Limitations:
0.62 lb NOx/hr and 2.73 TPY NOx, from the RTO
- Applicable Compliance Method:
Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.
- If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.
- The annual emission limitation was established by multiplying the hourly NOx limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
- c. Emission Limitations:
0.15 lb NOx/hr and 0.61 ton NOx/yr, from the oven
- Applicable Compliance Method:
Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the oven (1.0 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.
- If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.
- The annual NOx emission limitation was established by multiplying the hourly NOx emission limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and with the restriction on the annual number of hours of operation, compliance shall also be shown with the annual emission limitation.
- d. Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OC
- Applicable Compliance Method:
Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2. of this permit.
- e. Emission Limitation:
8,030 hours of operation/yr
- Applicable Compliance Method:
Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.3. and A.III.4. of this permit.
2. 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 3 months after permit issuance and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiency requirements for OC, and to determine the oven/booth split as defined in section A.I.2.e of this permit.
- c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
- 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.) 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 the 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.
3. 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, Northwest District Office. The "Intent to Test" notification shall describe in

detail the proposed test methods and procedures, the emissions units 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: P019 Issuance type: Title V Preliminary Proposed 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>
primer oven with cooling zone and regenerative zone thermal oxidizer (RTO); paint line #3		none

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 permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
 Pollutant: ethyl benzene
 TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.37
 Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
 TLV (ug/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 2.54
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 14,048.00

Pollutant: xylene
 TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.06
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: toluene
 TLV (ug/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.26
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 4,476.00

Pollutant: methanol
 TLV (ug/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.01
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 6,238.00

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: R009 Issuance type: Title V Preliminary Proposed 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>
primer booth with water curtain, flash zone, and regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	1.94 lbs organic compounds (OC)/hr 7.76 tons OC/yr (for this emissions unit) 0.068 lb particulate emissions (PE)/hr, 0.28 ton PE/yr Visible PE shall not exceed 0% opacity, as a six-minute average. combustion emissions from the RTO: 0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.) See A.I.2.b. See A.I.2.c. See A.I.2.e. See A.I.2.e.
<p>2. Additional Terms and Conditions</p>		

- a. Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- b. Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- c. The hourly emission limitation and control efficiency requirements based on this rule are less stringent than the hourly emission limitation and control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P019), the permittee shall utilize a value of 98 percent as the maximum percentage of the OCs employed in the paint booth that are emitted uncontrolled from the paint booth. The remaining 2 percent of the OCs employed in the paint booth shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven was based upon emission testing conducted by the permittee. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the booth/oven split (weight %).

- e. The emission limitation based on this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, 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.
4. The permittee shall operate the water wash system whenever this emissions unit is in operation.
5. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO whenever this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

 - a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
3. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the total potential (prior to applying the booth/oven "split") OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds;
 - e. the total potential OC emission rate for all the coatings employed, in pounds, calculated by multiplying the OC emissions (from Section A.III.4.d) by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit);

- f. the total controlled OC emission rate for all the coatings and cleanup materials employed, in pounds, calculated by multiplying the [OC emissions (from Section A.III.4.e) + summation of (b x c) for all cleanup materials] by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance);
 - g. the number of hours of operation; and
 - e. the average hourly controlled OC emission rate, i.e., (f)/(g), in pounds per hour (average).
5. The permittee shall collect and record each year the following information for this emissions unit:
- a. the total controlled OC emission rate for all the coatings and cleanup materials, in tons, calculated by summing the daily OC emission rates, from Section A.III.4.f, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.4.g, for the calendar year.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District office) in writing of any daily record showing that the water wash system was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District office) within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 1.94 pounds.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
1.94 lbs OC/hr & 7.76 tons OC/yr

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.4 of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in Sections A.III.4 and 5 of this permit.
 - b. Emission Limitations:
0.068 lb PE/hr & 0.28 ton PE/yr

Applicable Compliance Method:
The permittee may demonstrate compliance with the actual worst case hourly PE rate (E) using the following equation for the paint spraying operations:

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

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

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

If required, compliance with the PE limitation above shall be determined in accordance with the test methods specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

The annual limitation was established by multiplying the hourly PE limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and the annual restriction on the number of hours of operation, compliance shall also be shown with the annual PE limitation.

- c. Emission Limitations:
0.62 lb NOx/hr and 2.73 TPY NOx, from the RTO
- Applicable Compliance Method:
Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.
- If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.
- The annual emission limitation was established by multiplying the hourly NOx limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
- d. Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.
- Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
- e. Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OCs
- Applicable Compliance Method:
Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.
- f. Emission Limitation:
8,030 hours of operation/yr
- Applicable Compliance Method:
Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.
 - The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiencies for OC, and to determine the booth/oven split as defined in section A.I.2.d of this permit.
 - Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
- An OC emission test also shall be conducted on emissions unit P018 to determine oven/booth split as defined in section A.I.2.d of this permit.
- 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.) 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 the 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.
3. 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, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units 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, Northwest District

Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

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

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: R009 Issuance type: Title V Preliminary Proposed 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>
primer booth with water curtain, flash zone, and regenerative thermal oxidizer (RTO); paint line #3	none	none

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 permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00

Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00

Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy.":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: R011 Issuance type: Title V Preliminary Proposed 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>
clearcoat booth, with water curtain, flash zone, and regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	1.96 lbs organic compounds (OC)/hr 7.88 tons OC/yr (for this emissions unit) 0.096 lb particulate emissions (PE)/hr, 0.38 ton PE/yr Visible PE shall not exceed 0% opacity, as a six-minute average. combustion emissions from the RTO: 0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.) See A.I.2.b. See A.I.2.c. See A.I.2.e. See A.I.2.e.

2. Additional Terms and Conditions

- a. Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- b. Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- c. The hourly emission limitation and control efficiency requirements based on this rule are less stringent than the hourly emission limitation and control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P008), the permittee shall utilize a value of 98 percent as the maximum percentage of the OCs employed in the paint booth that are emitted uncontrolled from the paint booth. The remaining 2 percent of the OCs employed in the paint booth shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven was based upon emission testing conducted by the permittee. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the booth/oven split (weight %).
- e. The emission limitation based on this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, 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.
4. The permittee shall operate the water wash system whenever this emissions unit is in operation.
5. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO whenever this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

 - a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
3. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the total potential (prior to applying the booth/oven "split") OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds;
 - e. the total potential OC emission rate for all the coatings employed, in pounds, calculated by multiplying the OC emissions (from Section A.III.4.d) by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit);
 - f. the total controlled OC emission rate for all the coatings and cleanup materials employed, in pounds, calculated by multiplying the [OC emissions (from Section A.III.4.e) + summation of (b x c) for all cleanup

- materials] by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance);
- g. the number of hours of operation; and
 - e. the average hourly controlled OC emission rate, i.e., (f)/(g), in pounds per hour (average).
5. The permittee shall collect and record each year the following information for this emissions unit:
- a. the total controlled OC emission rate for all the coatings and cleanup materials, in tons, calculated by summing the daily OC emission rates, from Section A.III.4.f, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.4.g, for the calendar year.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District office) in writing of any daily record showing that the water wash system was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District office) within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 1.96 pounds.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
1.96 lbs OC/hr & 7.88 tons OC/yr

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.4 of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in Sections A.III.4 and 5 of this permit.
 - b. Emission Limitations:
0.096 lb PE/hr & 0.38 ton PE/yr

Applicable Compliance Method:
The permittee may demonstrate compliance with the actual worst case hourly PE rate (E) using the following equation for the paint spraying operations:

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

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

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

If required, compliance with the PE limitation above shall be determined in accordance with the test methods specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

The annual limitation was established by multiplying the hourly PE limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and the annual restriction on the number of hours of operation, compliance shall also be shown with the annual PE limitation.

- c. Emission Limitations:
0.62 lb NOx/hr and 2.73 TPY NOx, from the RTO
- Applicable Compliance Method:
Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.
- If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.
- The annual emission limitation was established by multiplying the hourly NOx limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
- d. Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.
- Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
- e. Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OCs
- Applicable Compliance Method:
Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.
- f. Emission Limitation:
8,030 hours of operation/yr
- Applicable Compliance Method:
Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 6 months prior to permit expiration.
 - The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiencies for OC, and to determine the booth/oven split as defined in section A.I.2.d of this permit.
 - Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
- An OC emission test also shall be conducted on emissions unit P008 to determine oven/booth split as defined in section A.I.2.d of this permit.
- 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.) 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 the 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.
3. 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, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units 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, Northwest District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

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

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: R011 Issuance type: Title V Preliminary Proposed 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>
clearcoat booth, with water curtain, flash zone, and regenerative thermal oxidizer (RTO); paint line #3	none	none

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 permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
 Pollutant: ethyl benzene
 TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.37
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone

TLV (ug/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 2.54
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 14,048.00

Pollutant: xylene

TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.06
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: toluene

TLV (ug/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.26
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 4,476.00

Pollutant: methanol

TLV (ug/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.01
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 6,238.00

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy.":
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

- None

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V. **Testing Requirements**

- None

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VI. **Miscellaneous Requirements**

- None

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Facility ID: 0372030199 Emissions Unit ID: R018 Issuance type: Title V Preliminary Proposed 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>
color booth with water curtain, flash zone, and regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	3.53 lbs organic compounds (OC)/hr 14.16 tons OC/yr (for this emissions unit)
		0.021 lb particulate emissions (PE)/hr, 0.09 ton PE/yr Visible PE shall not exceed 0% opacity, as a six-minute average.
		combustion emissions from the RTO: 0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-21-07 (G)(2)	See A.I.2.c.
	OAC rule 3745-17-11 (B)	See A.I.2.e.
	OAC rule 3745-17-07 (A)	See A.I.2.e.

2. Additional Terms and Conditions

- a. Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- b. Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- c. The hourly emission limitation and control efficiency requirements based on this rule are less stringent than the hourly emission limitation and control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P008), the permittee shall utilize a value of 98 percent as the maximum percentage of the OCs employed in the paint booth that are emitted uncontrolled from the paint booth. The remaining 2 percent of the OCs employed in the paint booth shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven was based upon emission testing conducted by the permittee. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the booth/oven split (weight %).
- e. The emission limitation based on this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, 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.
4. The permittee shall operate the water wash system whenever this emissions unit is in operation.
5. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO whenever this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

 - a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
3. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the total potential (prior to applying the booth/oven "split") OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds;
 - e. the total potential OC emission rate for all the coatings employed, in pounds, calculated by multiplying the OC emissions (from Section A.III.4.d) by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit);
 - f. the total controlled OC emission rate for all the coatings and cleanup materials employed, in pounds, calculated by multiplying the [OC emissions (from Section A.III.4.e) + summation of (b x c) for all cleanup materials] by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance);
 - g. the number of hours of operation; and
 - e. the average hourly controlled OC emission rate, i.e., (f)/(g), in pounds per hour (average).

5. The permittee shall collect and record each year the following information for this emissions unit:
 - a. the total controlled OC emission rate for all the coatings and cleanup materials, in tons, calculated by summing the daily OC emission rates, from Section A.III.4.f, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.4.g, for the calendar year.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District office) in writing of any daily record showing that the water wash system was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District office) within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 3.53 pounds.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

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V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
3.53 lbs OC/hr & 14.16 tons OC/yr

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.4. of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.
 - b. Emission Limitations:
0.021 lb PE/hr & 0.09 ton PE/yr

Applicable Compliance Method:
The permittee may demonstrate compliance with the actual worst case hourly PE rate (E) using the following equation for the paint spraying operations:

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

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

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

If required, compliance with the PE limitation above shall be determined in accordance with the test methods specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

The annual limitation was established by multiplying the hourly PE limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and the annual restriction on the number of hours of operation, compliance shall also be shown with the annual PE limitation.

- c. Emission Limitations:
0.62 lb NOx/hr and 2.73 TPY NOx, from the RTO
- Applicable Compliance Method:
Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.
- If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.
- The annual emission limitation was established by multiplying the hourly NOx limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
- d. Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.
- Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
- e. Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OCs
- Applicable Compliance Method:
Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.
- f. Emission Limitation:
8,030 hours of operation/yr
- Applicable Compliance Method:
Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.
2. 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 6 months prior to permit expiration.
- The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiencies for OC, and to determine the booth/oven split as defined in section A.I.2.d of this permit.
- c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
- An OC emission test also shall be conducted on emissions unit P008 to determine oven/booth split as defined in section A.I.2.d of this permit.
- 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.) 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 the 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.
3. 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, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units 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, Northwest District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.
- A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days

following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030199 Emissions Unit ID: R018 Issuance type: Title V Preliminary Proposed 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>
color booth with water curtain, flash zone, and regenerative thermal oxidizer (RTO); paint line #3	none	none

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 permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl benzene
 TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.37
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
 TLV (ug/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 2.54
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43.7

MAGLC (ug/m3): 14,048.00

Pollutant: xylene
 TLV (ug/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.06
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 10,333.00

Pollutant: toluene
 TLV (ug/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.26
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 4,476.00

Pollutant: methanol
 TLV (ug/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.01
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 43.7
 MAGLC (ug/m3): 6,238.00

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None