

Facility ID: 0448010072 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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

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

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

- Z002 - paint booth
- Z003 - boiler #1
- Z004 - boiler #2
- Z005 - boiler #3
- Z006 - resin storage tank
- Z007 - parts washer
- Z008 - MIG welders
- Z009 - resistance welders
- Z010 - maintenance welders
- Z011 - touch-up painting
- Z012 - infra-red heaters
- Z013 - forced air heaters
- Z014 - make-up air unit
- Z015 - forklifts

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0448010072 Emissions Unit ID: K001 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
electro-cathodic water based coating line with 7 million Btu natural gas indirect fired curing oven for miscellaneous metal parts	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per million Btus of actual heat input
	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

- a. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include an identification of each day when a fuel other than natural gas was burned in this emissions unit.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
3. The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be demonstrated through the required monitoring and recordkeeping of section A.III.1. If required, compliance shall also be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:
 

0.020 pound of particulate emissions per million Btu of actual heat input

Applicable Compliance Method:

Compliance shall be based upon a particulate emission factor of 1.9 pounds of particulate matter per million standard cubic feet, a heating value of 1020 Btus per standard cubic foot, and the monitoring and recordkeeping requirements of section A.III.1. This particulate emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).
  - c. Emission Limitation:
 

3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated through the required monitoring and recordkeeping of section A.III.2 as specified in OAC rule 3745-21-09(B)(3)(f). In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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VI. **Miscellaneous Requirements**

1. None

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**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>
electro-cathodic water based coating line	OAC rule 3745-31-05	For the coatings:

with 7 million Btu natural gas indirect fired (PTI 04-1160)  
curing oven for miscellaneous metal parts

0.8 pound of VOC per gallon of coating, as applied,  
excluding water and exempt solvents, as a monthly  
volume-weighted average

For the coatings and cleanup materials:

12.04 lbs/hr of VOC  
52.7 tpy of VOC

0.91 lb/hr of diethylene glycol monobutyl ether  
3.98 tpy of diethylene glycol monobutyl ether  
See B.I.2.b below.

9.36 lbs/hr of 2-butoxyethanol  
41.0 tpy of 2-butoxyethanol  
See B.I.2.b below.

0.56 lb/hr of ethylene glycol monoethyl ether  
2.45 tpy of ethylene glycol monoethyl ether  
See B.I.2.b below.

For the oven burner exhaust:

0.59 lb/hr of carbon monoxide (CO)  
2.57 tpy of CO

0.70 lb/hr of nitrogen oxides (NOx)  
3.07 tpy of NOx

0.013 lb/hr of particulates  
0.06 tpy of particulates

0.004 lb/hr of sulfur dioxide (SO2)  
0.02 tpy of SO2

0.04 lb/hr of VOC  
0.17 tpy of VOC

See B.I.2.a below.

See B.I.2.a below.

OAC rule 3745-21-08(B)

OAC rule 3745-23-06(B)

2. **Additional Terms and Conditions**

- a. This applicable rule is equivalent with the best available technology determination of PTI 04-1160, as issued.
- b. Ethylene glycolmonoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether are VOCs. The emissions of these Hazardous Air Pollutants (HAPS) shall be included in the emissions calculations for VOC.

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II. **Operational Restrictions**

- 1. None

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

- 1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating material employed (excluding water and exempt solvents);
  - d. the monthly volume weighted-average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

- e. the name and identification of each cleanup material employed;
  - f. the VOC content (excluding water and exempt solvents) of each cleanup material, in pounds per gallon;
  - g. the number of gallons of each cleanup material employed (excluding water and exempt solvents);
  - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
  - i. the total number of hours the emissions unit was in operation; and
  - j. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (h)/(i), in pounds per hour (average).
- 2. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating, as applied;
  - b. the ethylene glycolmonoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating material employed (excluding water and exempt solvents);
  - d. the name and identification of each cleanup material employed;
  - e. the ethylene glycolmonoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether content (excluding water and exempt solvents) of each cleanup material, in pounds per gallon;
  - f. the number of gallons of each cleanup material employed (excluding water and exempt solvents);
  - g. the total ethylene glycolmonoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether emissions from all coatings and cleanup materials employed, in pounds or tons;
  - h. the total number of hours the emissions unit was in operation; and
  - i. the average hourly ethylene glycolmonoethyl ether, 2-butoxyethanol and diethylene glycol monobutyl ether emission rate for all coatings and cleanup materials, i.e., (g)/(h), respectively, in pounds per hour (average).
- 3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. 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. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that the monthly volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- 2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each month during which the average hourly VOC emissions rate from the coatings and cleanup materials exceeded 12.04 pounds per hour, and the actual average hourly VOC emissions for each such month;
  - b. an identification of each month during which the average hourly ethylene glycolmonoethyl ether emissions rate from the coatings and cleanup materials exceeded 0.56 pounds per hour, and the actual average hourly ethylene glycolmonoethyl ether emissions for each such month; and
  - c. an identification of each month during which the average hourly 2-butoxyethanol emissions rate from the coatings and cleanup materials exceeded 9.36 pounds per hour, and the actual average hourly 2-butoxyethanol emissions for each such month; and
  - d. an identification of each month during which the average hourly diethylene glycol monobutyl ether emissions rate from the coatings and cleanup materials exceeded 0.91 pounds per hour, and the actual average hourly diethylene glycol monobutyl ether emissions for each such month.
- 3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

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#### V. Testing Requirements

- 1. Compliance with the emission limitations in section B.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
- 0.8 pound of VOC per gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average
- Applicable Compliance Method:
- Compliance shall be demonstrated through the required monitoring and recordkeeping of section B.III.1\*. VOC contents shall be determined in accordance with USEPA Methods 24 and 24A. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
- \*(For the resin, the lbs. VOC content determined by Method 24 shall be multiplied by 4.8 to obtain the lbs VOC actually emitted to account for any chemical cross linking emissions generated in the curing oven.)
- b. Emission Limitation:
- 52.7 lbs/hr of VOC
- Applicable Compliance Method:
- Compliance shall be demonstrated through the required recordkeeping of section B.III.1. VOC contents shall be determined in accordance with USEPA Methods 24 and 24A. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. If required, the permittee shall also demonstrate compliance by Method 18, 25 or 25A of 40 CFR Part 60, Appendix A.
- c. Emission Limitation:
- 0.56 lb/hr of ethylene glycol monohexyl ether  
2.45 tpy of ethylene glycol monohexyl ether
- 9.36 lbs/hr of 2-butoxyethanol  
41.0 tpy of 2-butoxyethanol
- 0.91 lb/hr of diethylene glycol monobutyl ether  
3.98 tpy of diethylene glycol monobutyl ether
- Applicable Compliance Method:
- Compliance shall be demonstrated through the required recordkeeping of section B.III.2\*. The HAP concentrations shall be determined using formulation data. If required, the permittee shall also demonstrate compliance by Method 18 of 40 CFR Part 60, Appendix A.
- \*( For the resin, the lbs. 2-butoxyethanol determined by Method 24 shall be multiplied by 4.8 to obtain the lbs 2-butoxyethanol actually emitted to account for any chemical cross linking emissions generated in the curing oven.)
- d. Emission Limitation:
- 0.59 lb/hr of CO  
2.57 tpy of CO
- Applicable Compliance Method:
- Compliance shall be determined through the monitoring and record keeping requirements of section B.III.3, an emission factor of 84 pounds of carbon monoxide per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.
- e. Emission Limitation:
- 0.70 lb/hr of NOx  
3.07 tpy of NOx
- Applicable Compliance Method:
- Compliance shall be determined through the monitoring and record keeping requirements of section B.III.3, an emission factor of 100 pounds of nitrogen oxides per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A. Alternate,

equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

0.007 lb/hr of particulates  
0.06 tpy of particulates

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 1.9 pounds of particulate matter per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and recordkeeping requirements of section B.III.3. This emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

0.004 lb/hr of SO<sub>2</sub>  
0.02 tpy of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.6 pound of SO<sub>2</sub> per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and recordkeeping requirements of section B.III.3. This emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-18-04 (A), (F)(3), or (F)(4). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation:

0.04 lb/hr of VOC  
0.17 tpy of VOC

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 5.5 pounds of total organic compounds per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and recordkeeping requirements of section B.III.3. This emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

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VI. **Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 04-1160. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the 2-butoxyethanol emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:
 

Pollutant: 2-butoxyethanol  
TLV (ug/m3): 121,000  
Maximum Hourly Emission Rate (lbs/hr): 9.36  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 191.6  
MAGLC (ug/m3): 2,881
2. As long as the application of the "Air Toxic Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:
  - a. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, 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 TLV value specified in the above table;
  - b. any change to the emissions unit or its exhaust parameters (e.g., reduction of exhaust gas flow rate, or decreased stack height);
  - c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the

definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.