

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

## **C. Emissions Unit Terms and Conditions**

**1. K003, Nordson Line**

**Operations, Property and/or Equipment Description:**

Liquid and/or Powder Fluoropolymer Coating operation for commercial baking pans with 4MMBTU/hr gas-fired tunnel oven.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f., and d)(8).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Use of compliance coatings for metal parts and products as defined in OAC rule 3745-21-09(U)(1)(c).  See section c)(1)below.
b.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	See Sections b)(2)b., c)(4), and d)(9), below when applying powder coatings.
c.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Section b)(2)c., below.
d.	OAC rule 3745-21-09(U)(1)(c)	Use of compliance coatings.  See sections c)(1), d)(1), e)(1), and f)(1)
e.	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a six-minute average.  See section f)(1)a., below.
f.	OAC rule 3745-17-10(B)	0.02 lb of PE per mmBTU from the tunnel oven

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See section c)(3), d)(2), e)(2), f)(1)b., below.
g.	OAC rule 3745-17-11(C)	Dry filter system to control particulate overspray.  See section b)(2)a., c)(2), d)(3) thru (7). below
h.	OAC rule 3745-114-01	Ohio AirToxics Rule  See section d)(8), below.

(2) Additional Terms and Conditions

- a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- c. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) emissions from this emissions unit since the potential emissions are less than ten tons per year.

c) Operational Restrictions

- (1) Liquid coating materials employed in this operation shall not exceed 3.5 pounds VOC per gallon, excluding water and exempt solvents, as applied.

- (2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-17-11(C)(1) and (2)(b)]

- (3) The fuel employed in the tunnel oven shall be only natural gas or propane.
- (4) The permittee shall maintain and operate this emissions unit in accordance the manufacturer's recommended maintenance procedures and/or operational specifications when powder coating are applied.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. The company identification of each coating material employed; and
  - b. The VOC content of each coating employed, in pounds per gallon.
- (2) For each day during which the permittee burns a fuel other than natural gas or propane in the tunnel oven, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

- (8) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittee(s) to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

[ORC 3704.03(F)(3)(c) and F(4)]

- (9) The permittee shall maintain records that document any time periods while employing powder coating products that this emissions unit was not maintained in accordance the manufacturer's recommendation maintenance procedures and/or operational specifications.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible emissions shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

b. Emission Limitation:

0.020 pound per million Btu of actual heat input

Applicable Compliance Method:

Compliance is assumed based on the use of natural gas and/or propane as fuel in the drying tunnel and the record keeping in section d)(2) and reporting requirement in section e)(2) of this permit.

c. Emission Limitation:

VOC content of coatings employed shall not exceed 3.5 pounds VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based on the record keeping in section d)(1) and reporting requirements in section e)(1), of this permit.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) None.