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Facility Name: **Voyale Corporation**

Application Number: **13-3350**

Date: **Draft PTI (date will be entered upon final issuance)**

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

#### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

#### **PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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**BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

**SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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The air contaminant emissions units listed below comprise the Permit to Install for **Voyale Corporation** located in **Cuyahoga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K002	Devil Bliss paint spray booth with hoods and filter media	Compliance with the terms and conditions and the limitations of this permit; PM filter	3745-31-05 3745-21-09 (U) 3745-17-11 3745-17-07	VOC 1.41 pounds/hour VOC 2.60 TPY VOC PM 2.00 pounds/hour PM 0.736 TPY PM HAP 1.09 pounds/hour HAP 1.99 TPY HAP  No visible emissions
K003	Devil Bliss paint spray booth with hoods and filter media	Compliance with the terms and conditions and the limitations of this permit; PM filter	3745-31-05 3745-21-09 (U) 3745-17-11 3745-17-07	VOC 1.41 pounds/hour VOC 2.60 TPY VOC PM 2.00 pounds/hour PM 0.736 TPY PM HAP 1.09 pounds/hour HAP 1.99 TPY HAP  No visible emissions
K004	Devil Bliss paint spray booth with hoods and filter media	Compliance with the terms and conditions and the limitations of this permit; PM filter	3745-31-05 3745-21-09 (U) 3745-17-11 3745-17-07	VOC 1.41 pounds/hour VOC 2.60 TPY VOC PM 2.00 pounds/hour PM 0.736 TPY PM

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K004 Cont'd				HAP 1.09 pounds/hour HAP 1.99 TPY HAP  No visible emissions
K005	Binks paint spray booth with hoods and filter media	Compliance with the terms and conditions and the limitations of this permit; PM filter	3745-31-05 3745-21-09 (U) 3745-17-11 3745-17-07	VOC 1.41 pounds/hour VOC 2.60 TPY VOC PM 2.00 pounds/hour PM 0.736 TPY PM HAP 1.09 pounds/hour HAP 1.99 TPY HAP  No visible emissions
K006	Binks paint spray booth with hoods and filter media	Compliance with the terms and conditions and the limitations of this permit; PM filter	3745-31-05 3745-21-09 (U) 3745-17-11 3745-17-07	VOC 1.41 pounds/hour VOC 2.60 TPY VOC PM 2.00 pounds/hour PM 0.736 TPY PM HAP 1.09 pounds/hour HAP 1.99 TPY HAP  No visible emissions

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	13.00
HAP	9.95
PM	3.68

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114.**

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Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

#### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

##### **A. Applicable Emission Limitations and/or Control Requirements**

1. Emissions from emissions units K002-K006 shall be controlled with filter media. Particulate matter (PM) emissions shall not exceed 2.00 pounds/hour and 3.68 tons/year.
2. There shall be no visible emissions of particulate matter.
3. VOC emissions from coating materials employed in emissions units K002-K005 shall not exceed 13.0 tons/year.
4. HAPs employed in emissions unit K002-K006 shall not exceed 9.95 tons/year.

##### **B. Operational Restrictions**

1. This permit allows the use of the coating materials specified by the permittee in the application for PTI No. 13-3350. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxic Policy" and is (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 air toxic based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

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**Pollutant: Ethylene Glycol Butyl Ether (2-Butoxyethanol)**

**TLV (mg/m<sup>3</sup>): 121**

**Maximum Hourly Emission Rate (lbs/hr): 1.08 lbs/hr (per booth)**

**1 Hour Maximum Ground-Level Concentration at the Fenceline (mg/m<sup>3</sup>): 0.5418 (5 booths)**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (mg/m<sup>3</sup>): 2.88**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Cleveland Air Pollution Control are required, including the possible issuance of modifications to PTI No. 13-3350 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified above;
  - b. any change to the emissions units or their exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
  - c. 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; and,
  - d. any change in the composition of the coatings, or use of new coatings 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)].
2. The maximum annual HAPS employed for the emissions units shall not exceed 9.95 tons/year, based upon a rolling 265-day summation of the HAPS figures.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAPS employed level specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative HAPs Usage</u>
1	2.49 TPY
1-2	3.17 TPY
1-3	3.85 TPY
1-4	4.53 TPY
1-5	5.21 TPY
1-6	5.89 TPY
1-7	6.57 TPY
1-8	7.25 TPY
1-9	7.93 TPY
1-10	8.61 TPY
1-11	9.29 TPY
1-12	9.95 TPY

After the first 12 calendar months of operation, compliance with the annual HAPs employed limitation shall be based upon a rolling, 365-day summation HAPs employed figures.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the coating usage and HAPs in the emissions units:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the VOC content of each coating employed;
  - d. the total volume, in gallons, of all of the coatings employed (sum of b);
  - e. the VOC emissions rate from each coating, in pounds per day (b\*c);
  - f. the VOC emissions rate from all coatings, in pounds per day (sum of e);
  - g. the HAP content of each coating employed;
  - h. the HAP emissions rate from each coating, in pounds per day (b\*g);
  - i. the HAP emissions rate from all coatings, in pounds per day (sum of h); and,
  - j. beginning after the first 12 calendar months of operation, the rolling, 365-day summation of the HAPs employed.

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Also, during the first 12 calendar months of operation, the permittee shall record the cumulative coating usage for each calendar month.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative HAPs employed. These reports are due by the last day of the month following the end of each calendar quarter (January 31, etc.).

**E. Testing Requirements**

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following methods(s):

a. Emission Limitation

13.0 TPY VOC

9.95 TPY HAP

Applicable Compliance Method

Compliance with the emissions limitations shall be determined pursuant to the monitoring and recordkeeping. Also, at the request of the Ohio EPA, compliance shall be determined by the USEPA Method 24.

b. Emission Limitation

2.00 lbs/hr PM

Applicable Compliance Method

As long as the represented maximum hourly coating application rate and daily maximum coating usage limitation for this emissions unit is not exceeded, and the control equipment for particulate matter (filter media) is operating properly and in accordance with the manufacturer's specifications, compliance with the respective particulate matter limits of 2.00 lbs/hr and 3.68 TPY will be assumed to be maintained.

However, to determine the actual worst case emissions rate for particulate matter, the following equation shall be used:

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

E = Particulate matter emission rate (lbs/hr)

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control efficiency of the control equipment

3. Emission Limitation

No visible emissions of PM

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)