State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

**TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

10/24/01

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

03-74-01-0194
Alpha Coatings, Inc.
Cyndi J Frombaugh
1100 North Main Street
Fostoria, OH 44830

Dear Cyndi J Frombaugh:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

**If you have any questions or comments concerning this draft Title V permit, please contact Northwest District Office.**

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronically submitted)
File, DAPC PMU
Northwest District Office

State of Ohio Environmental Protection Agency

# DRAFT TITLE V PERMIT

| Issue Date: 10/24/01 | Effective Date: To be entered upon final issuance | Expiration Date: To be entered upon final issuance |
|---|---|---|

This document constitutes issuance of a Title V permit for Facility ID: 03-74-01-0194 to:

Alpha Coatings, Inc.
1100 North Main Street
Fostoria, OH 44830

## Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (K001)
Water Borne Primer/Topcoat Booth with Oven

K002 (K002)
Solvent Primer/Topcoat Manual Spray Booth

K003 (K003)
Chain On Edge Solvent Primer/Topcoat Booth with Oven

K004 (K004)
Chain On Edge Solvent Primer/Topcoat Booth with Oven

K005 (K005)
Water Borne Primer/Topcoat Booth with Oven

R002 (R002)
Water Borne Topcoat Booth with Oven

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

### 1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## 6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## 7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

## 8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

## 9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

## 10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

## 11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## 12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

## 13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

## 14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

## 15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

## 16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

## 17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

## 18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

# B. State Only Enforceable Section

## 1. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

## 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

## 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

## 6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

## 7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## 8. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

# Part II - Specific Facility Terms and Conditions

## A. State and Federally Enforcable Section

**None**

## B. State Only Enforceable Section

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

Paint Fixture Burn Off Oven, Ohio EPA emissions unit N001;
Water Borne Primer Booth with Oven, Ohio EPA emissions unit R001;
Rock St. Parking Lot Heater Inside Building, Ohio EPA emissions unit Z001;
Heater Near Manual Booth Inside Building, Ohio EPA emissions unit Z002;
Heater Near Production Area Restrooms, Ohio EPA emissions unit Z003;
Heater in Warehouse Area, Ohio EPA emissions unit Z004.

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.

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** K001 (K001)

**Activity Description:** Water Borne Primer/Topcoat Booth with Oven

## A. State and Federally Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| adhesive primer line - with oven (metal parts, automotive) | OAC rule 3745-17-11(B)(1) | 0.551 lb/hr particulate emissions (PE) |
| | OAC rule 3745-17-07(A) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-21-09(U)(1)(c) | 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents |
| | OAC rule 3745-31-05 (PTI No. 03-5559) | 62.4 pounds of organic compounds (OC) per day<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-17-11(B) and 3745-21-09(U)(1)(c). |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**2.** The permittee shall not employ any cleanup material in this emissions unit that contains OCs or hazardous air pollutants (HAPs).

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall collect and record the following information each day for the line:

a. The name and identification number of each coating and cleanup material employed.

b. The VOC content, in lbs/gallon of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

d. The volume, in gallons, of each coating employed.

e. The OC content of each coating employed, in pounds per gallon.

f. The OC emission rate from each coating employed (d x e), in pounds.

g. The total OC emission rate from all the coatings employed [summation of f for all coatings], in pounds.

h. Documentation on whether or not each cleanup material employed contained any OCs and/or HAPs.

**2.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable VOC content limitation of 3.5 pounds per gallon of coating, excluding water and exempt solvents. 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 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 the 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 quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the daily OC emission limitation of 62.4 pounds, and the actual OC emission rate for each such day.

b. All time periods during which any cleanup material containing OCs and/or HAPs was employed in this emissions unit. The summaries shall also include an estimate of the actual OC emissions resulting from the use of these cleanup materials.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, General Terms and Conditions, of this permit.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation may be used for this emissions unit:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

**1.b** Emission Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC rule 3745-17-03(B)(1).

**1.c** Emission Limitation:
3.5 pounds of VOC per gallon, excluding water and exempt solvents

Applicable Compliance Method:
The record keeping requirements in section A.III.1 of this permit shall be used to determine compliance with the VOC content limitation above.

**1.d** Emission Limitation:
62.4 pounds of OC per day

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily allowable OC emission limitation above.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings.

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** K002 (K002)

**Activity Description:** Solvent Primer/Topcoat Manual Spray Booth

## A. State and Federally Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| adhesive line - with oven (metal parts, automotive) | OAC rule 3745-17-11(B)(1) | 0.551 lb/hr particulate emissions (PE) |
| | OAC rule 3745-17-07(A) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-21-09(U)(2)(e) | not more than 10 gallons per day of coating usage |
| | OAC rule 3745-31-05 (PTI No. 03-5559) | 86.1 pounds of organic compounds (OC) per day<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B) and 3745-21-09(U)(2)(e). |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**2.** The permittee shall not employ any cleanup material in this emissions unit that contains OCs.

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating employed.

b. The volume, in gallons, of each coating employed.

c. The OC content of each coating employed, in pounds per gallon.

d. The OC emission rate from each coating employed (b x c), in pounds.

e. The total OC emission rate from all the coatings employed [summation of d for all coatings], in pounds.

f. The total volume, in gallons, of all the coatings employed [summation of b for all coatings].

g. Documentation on whether or not each cleanup material employed contained any OCs.

**2.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. 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 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 the 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 quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the daily OC emission limitation of 86.1 pounds, and the actual OC emission rate for each such day.

b. All time periods during which any cleanup material containing OCs was employed in this emissions unit. The summaries shall also include an estimate of the actual OC emissions resulting from the use of these cleanup materials.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, General Terms and Conditions, of this permit.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation may be used for this emissions unit:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-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 (40% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

**1.b** Emission Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC rule 3745-17-03(B)(1).

**1.c** Emission Limitation:
86.1 pounds of OC per day

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily allowable OC emission limitation above.

**1.d** Usage Restriction:
10 gallons per day of coating usage

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily gallon usage restriction above.

**2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.

## VI. Miscellaneous Requirements

**1.** The permittee modified (expanded) this emissions unit without first applying for and obtaining a permit to install (PTI) modification, in violation of OAC rule 3745-31-02. Also, the permittee is currently employing cleanup materials containing OCs [the original PTI application No. 03-5559 indicated that only cleanup materials that would not result in OC emissions would be employed]. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements and to account for the emissions of OCs from cleanup materials, the permittee shall submit a complete permit to install application within 2 months following the issuance of this permit.

## B. State Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** K003 (K003)

**Activity Description:** Chain On Edge Solvent Primer/Topcoat Booth with Oven

## A. State and Federally Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| spray booth 3 - with oven - adhesives (metal parts, automotive) | OAC rule 3745-17-11(B)(1) | 0.551 lb/hr particulate emissions (PE) |
| | OAC rule 3745-17-07(A) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-21-09(U)(2)(e) | not more than 10 gallons per day of coating usage |
| | OAC rule 3745-31-05 (PTI No. 03-8603) | 55.7 pounds of organic compounds (OC) per day<br><br>5.57 lbs OC/gallon of coating (for each coating employed)<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B) and 3745-21-09(U)(2)(e). |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**2.** The permittee shall not employ any cleanup material in this emissions unit that contains OCs.

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating employed.

b. The volume, in gallons, of each coating employed.

c. The OC content of each coating employed, in pounds per gallon.

d. The OC emission rate from each coating employed (b x c), in pounds.

e. The total OC emission rate from all the coatings employed [summation of d for all coatings], in pounds.

f. The total volume, in gallons, of all the coatings employed [summation of b for all coatings].

g. Documentation on whether or not each cleanup material employed contained any OCs.

**2.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. 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 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 the 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 quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the daily OC emission limitation of 55.7 pounds, and the actual OC emission rate for each such day.

b. All time periods during which any cleanup material containing OCs was employed in this emissions unit. The summaries shall also include an estimate of the actual OC emissions resulting from the use of these cleanup materials.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, General Terms and Conditions, of this permit.

**4.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the OC content of any coating exceeded the limitation of 5.57 pounds per gallon of coating. 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.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation may be used for this emissions unit:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-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 (40% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

**1.b** Emission Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC rule 3745-17-03(B)(1).

**1.c** Emission Limitation:
86.1 pounds of OC per day

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily allowable OC emission limitation above.

**1.d** Usage Restriction:
10 gallons per day of coating usage

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily gallon usage restriction above.

**1.e** OC Content Limitation:
5.57 lbs OC/gallon of coating (for each coating)

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the allowable OC content limitation above.

**2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.

## VI. Miscellaneous Requirements

**1.** The permittee modified (expanded) this emissions units without first applying for and obtaining a permit to install (PTI) modification, in violation of OAC rule 3745-31-02. Also, the permittee is currently employing cleanup materials containing OCs [the original PTI application No. 03-8603 indicated that only cleanup materials that would not result in OC emissions would be employed]. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements and to account for the emissions of OCs from cleanup materials, the permittee shall submit a complete permit to install application within 2 months following the issuance of this permit.

## B. State Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** K004 (K004)

**Activity Description:** Chain On Edge Solvent Primer/Topcoat Booth with Oven

## A. State and Federally Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| spray booth 4 - with oven - adhesives (metal parts, automotive) | OAC rule 3745-17-11(B)(1) | 0.551 lb/hr particulate emissions (PE) |
| | OAC rule 3745-17-07(A) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-21-09(U)(2)(e) | not more than 10 gallons per day of coating usage |
| | OAC rule 3745-31-05 (PTI No. 03-8603) | 71.4 pounds of organic compounds (OC) per day<br><br>7.14 lbs OC/gallon of coating (for each coating employed)<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B) and 3745-21-09(U)(2)(e). |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**2.** The permittee shall not employ any cleanup material in this emissions unit that contains OCs.

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating employed.

b. The volume, in gallons, of each coating employed.

c. The OC content of each coating employed, in pounds per gallon.

d. The OC emission rate from each coating employed (b x c), in pounds.

e. The total OC emission rate from all the coatings employed [summation of d for all coatings], in pounds.

f. The total volume, in gallons, of all the coatings employed [summation of b for all coatings].

g. Documentation on whether or not each cleanup material employed contained any OCs.

**2.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. 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 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 the 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 quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the daily OC emission limitation of 71.4 pounds, and the actual OC emission rate for each such day.

b. All time periods during which any cleanup material containing OCs was employed in this emissions unit. The summaries shall also include an estimate of the actual OC emissions resulting from the use of these cleanup materials.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, General Terms and Conditions, of this permit.

**4.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the OC content of any coating exceeded the limitation of 7.14 pounds per gallon of coating. 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.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation may be used for this emissions unit:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-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 (40% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

**1.b** Emission Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC rule 3745-17-03(B)(1).

**1.c** Emission Limitation:
71.4 pounds of OC per day

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily allowable OC emission limitation above.

**1.d** Usage Restriction:
10 gallons per day of coating usage

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily gallon usage restriction above.

**1.e** OC Content Limitation:
7.14 lbs OC/gallon of coating (for each coating)

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the allowable OC content limitation above.

**2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.

## VI. Miscellaneous Requirements

**1.** The permittee modified (expanded) this emissions units without first applying for and obtaining a permit to install (PTI) modification, in violation of OAC rule 3745-31-02. Also, the permittee is currently employing cleanup materials containing OCs [the original PTI application No. 03-8603 indicated that only cleanup materials that would not result in OC emissions would be employed]. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements and to account for the emissions of OCs from cleanup materials, the permittee shall submit a complete permit to install application within 2 months following the issuance of this permit.

## B. State Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** K005 (K005)

**Activity Description:** Water Borne Primer/Topcoat Booth with Oven

## A. State and Federally Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| roll coat 1 - with oven (metal parts, automotive) | OAC rule 3745-17-11(B)(1) | 0.551 lb/hr particulate emissions (PE) |
| | OAC rule 3745-17-07(A) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-21-09(U)(1)(c) | 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents |
| | OAC rule 3745-31-05 (PTI No. 03-8603) | 50.4 pounds of organic compounds (OC) per day<br><br>5.04 lbs OC/gallon of coating (for each coating employed)<br><br>The requirements of this rule also include compliance with the requirement of OAC rules 3745-17-07(A), 3745-17-11(B) and 3745-21-09(U)(1)(c). |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**2.** The permittee shall not employ any cleanup material in this emissions unit that contains OCs or hazardous air pollutants (HAPs).

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall collect and record the following information each day for the line:

a. The name and identification number of each coating and cleanup material employed.

b. The VOC content, in lbs/gallon of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

d. The volume, in gallons, of each coating employed.

e. The OC content of each coating employed, in pounds per gallon.

f. The OC emission rate from each coating employed (d x e), in pounds.

g. The total OC emission rate from all the coatings employed [summation of f for all coatings], in pounds.

h. Documentation on whether or not each cleanup material employed contained any OCs and/or HAPs.

**2.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable VOC content limitation of 3.5 pounds per gallon of coating, excluding water and exempt solvents. 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 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 the 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 quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the daily OC emission limitation of 50.4 pounds, and the actual OC emission rate for each such day.

b. All time periods during which any cleanup material containing OCs and or/ HAPs was employed in this emissions unit. The summaries shall also include an estimate of the actual OC emissions resulting from the use of these cleanup materials.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, General Terms and Conditions, of this permit.

**4.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the OC content of any coating exceeded the limitation of 5.04 pounds per gallon of coating. 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.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation may be used for this emissions unit:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

**1.b** Emission Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC rule 3745-17-03(B)(1).

**1.c** Emission Limitation:
3.5 pounds of VOC per gallon, excluding water and exempt solvents

Applicable Compliance Method:
The record keeping requirements in section A.III.1 of this permit shall be used to determine compliance with the VOC content limitation above.

**1.d** Emission Limitation:
50.4 pounds of OC per day

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the daily allowable OC emission limitation above.

**1.e** OC Content Limitation:
5.04 lbs OC/gallon of coating (for each coating)

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the allowable OC content limitation above.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings.

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** R002 (R002)

**Activity Description:** Water Borne Topcoat Booth with Oven

## A. State and Federally Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| paint spray booth - topcoat - rubber molding (automotive) | OAC rule 3745-17-11(B)(1) | 0.551 lb/hr particulate emissions (PE) |
| | OAC rule 3745-17-07(A) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-21-07(G) | See condition A.II.2. |
| | OAC rule 3745-31-05 (PTI No. 03-7878) | 3.0 pounds of volatile organic compounds (VOC) per hour, from coating usage<br><br>2.53 lbs VOC /gallon of coating (for each coating employed)<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B) and 3745-21-07(G). |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**2.** The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

**1.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

## III. Monitoring and/or Record Keeping Requirements (continued)

**2.** The permittee shall maintain the following information each day for this emissions unit:

a. The company identification for each coating and cleanup material employed in this emissions unit.

b. Documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.

**3.** The permittee shall collect and record the following information each day for this emissions unit:

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, in pounds per gallon.

d. The VOC emission rate from each coating employed (b x c), in pounds.

e. The total VOC emission rate from all the coatings employed [summation of d for all coatings], in pounds.

f. The total number of hours the emissions unit was in operation.

g. The average hourly VOC emission rate from all the coatings employed, i.e., (e)/(f), in pounds per hour (average).

## IV. Reporting Requirements

**1.** 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 the 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.

**2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any coating and/or cleanup material in this emissions unit that is a photochemically reactive material. 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 event occurs.

**3.** The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the hourly VOC emission limitation of 3.0 pounds, and the actual average hourly VOC emissions for each such day; and

b. all exceedances of the VOC content limitation of 2.53 lbs VOC/gallon of coating.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I - General Terms and Conditions- of this permit.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation may be used for this emissions unit:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

**1.b** Emission Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

**1.c** Emission Limitations:
3.0 pounds of VOC per hour
2.53 lbs VOC /gallon of coating (for each coating employed)

Applicable Compliance Method:
The record keeping requirements in Section A.III.3 of this permit shall be used to determine compliance with the hourly allowable VOC emission limitation and the VOC content restriction above.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

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