



State of Ohio Environmental Protection Agency

Street Address:

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

11/14/01

**RE: Proposed Title V Chapter 3745-77 Permit  
03-86-00-0060  
BDJ Industries**

Attn: Genevieve Damico AR-18J  
United States Environmental Protection Agency  
Region V  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for BDJ Industries, has been created in Ohio EPA's State Air Resources System (STARS) on 11/14/01, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



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

cc: Northwest District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 11/14/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-86-00-0060 to:  
 BDJ Industries  
 516 North Parkway  
 PO Box 859  
 West Unity, OH 43570

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

R001 (Paint Booth #1) Coating Operation	R005 (Paint Booth #5) Coating Operation	Z004 (Paint Booth #9) Coating Operation
R002 (Paint Booth #2) Coating Operation	R006 (Paint Booth #6) Coating Operation	Z005 (Paint Booth #10) Coating Operation
R003 (Paint Booth #3) Coating Operation	R007 (Paint Booth #7) Coating Operation	Z006 (Large Solvent Cleaner) Cold Solvent Cleaning (Acetone)
R004 (Paint Booth #4) Coating Operation	R008 (Paint Booth #8) Coating Operation	

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 emission limitations, operational restrictions, and control device operating parameter limitations, 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 monitoring, recordkeeping, and reporting requirements 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 unit is located at this facility:

Small Solvent Cleaner, Ohio EPA emissions unit Z007;

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:** Paint Booth #10 (K001)  
**Activity Description:** Coating Operation

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 10 - metal parts - with exhaust filters	OAC 3745-21-09(U)(2)(e)	not more than 10 gallons per day of coating usage
	OAC rule 3745-17-11(B)	none (see section A.I.2.a)
	OAC rule 3745-17-07(A)	none (see section A.I.2.b)
	OAC rule 3745-31-05 (PTI 03-13254)	50.5 lbs organic compounds (OC) per day, 9.2 tons OC per year, from coating usage
		165 lbs OC per month, from cleanup material usage
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).

#### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

#### II. Operational Restrictions

None

### 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].
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material;
  - b. the volume, in gallons, of each cleanup material employed;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the OC emissions from each cleanup material employed (b x c), in pounds; and
  - e. the total OC emissions from all the cleanup materials employed [summation of 'd' for all cleanup materials], in pounds.

### 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 submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the daily OC emission limitation of 50.5 pounds (from coating usage), and the actual OC emission rate for each such day.
  - b. All exceedances of the monthly OC emission limitation of 165 pounds (from cleanup materials), and the actual OC emission rate for each such month.

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 B.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a 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.

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
50.5 pounds of OC per day, from 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 allowable OC emission limitation above.

**1.c** Emission Limitation:  
165 lbs OC per month, from cleanup material usage

Applicable Compliance Method:

The record keeping requirements in section A.III of this permit shall be used to determine compliance with the OC emission limitation above.

**1.d** Emission Limitation:  
9.2 tons OC/yr

Applicable Compliance Method:

The annual allowable OC limitation was developed by multiplying the daily allowable OC limitation (from coating usage) by 365, then dividing by 2000. Therefore, provided compliance is shown with the daily limitation, compliance shall also be shown with the annual limitation.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 10 - metal parts - with exhaust filters	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene\*

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.0

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 778

MAGLC (ug/m3): 4476

\* All emissions of toxic compounds in the coatings and cleanup materials were assumed to be toluene which has the lowest TLV of the remaining toxic compounds. In addition, emissions units L001, R004, R009, and K001 were all included in the modeling for air toxics since they emit the same pollutant and were part of the Permit to Install application.

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

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

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** Large Solvent Cleaner (L001)  
**Activity Description:** Cold Solvent Cleaning (Acetone)

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
solvent metal cold cleaner	OAC rule 3745-21-09 (O) (2)  OAC rule 3745-31-05 (PTI 03-13254)	See A.II.  21.5 tons organic compounds (OC)/year  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O)(2).

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
2. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
3. The cold cleaner cover shall be closed at all times except when loading and unloading parts.

## II. Operational Restrictions (continued)

4. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
  - b. Store waste solvent in covered containers.
  - c. Close the cover whenever parts are not being handled in the cleaner.
  - d. Drain the cleaned parts until dripping ceases.
  - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
  - f. Clean only materials that are neither porous nor absorbent.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the cleanup materials (solvents) used in this emissions unit:
  - a. The types of solvents employed in the cold cleaner.
  - b. The vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The company identification for each solvent employed.
  - b. The volume of each solvent employed, in gallons.
  - c. The organic compound content for each solvent employed, in gallons/pound.
  - d. The organic compound emission rate from each solvent employed (b x c), in pounds.
  - e. The total organic compound emission rate from all the solvents employed (summation of 'd' for all solvents), in pounds.
3. In lieu of section A.III.2, the permittee may alternatively calculate the monthly OC emission rate in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

monthly OC emissions from cleanup operations (pounds/month) = summation of [(Ai-Bi) X di] for i = 1 to n

where:

i = 1, 2, 3,...n

n = the total number of different types of cleanup materials employed

Ai = the number of gallons of cleanup material i consumed (gallons/month)

Bi = the number of gallons of cleanup material i sent off site for disposal or reclamation, minus solids content of said material (gallons/month)

di = density of cleanup material i, in pounds/gallon

## IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## **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):

Emission Limitation:  
21.5 tons OC/year

Applicable Compliance Method:

Compliance with the annual allowable organic compound emission limitation shall be based upon the record keeping requirements contained in sections A.III.2 or 3 of this permit and shall be the sum of the monthly OC emission rates for the calendar year.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
solvent metal cold cleaner	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene\*

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 778

MAGLC (ug/m3): 4476

\* All emissions of toxic compounds in the coatings and cleanup materials were assumed to be toluene which has the lowest TLV of the remaining toxic compounds. In addition, emissions units L001, R004, R009, and K001 were all included in the modeling for air toxics since they emit the same pollutant and were part of the Permit to Install application.

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

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

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Paint Booth #1 (R001)  
**Activity Description:** Coating Operation

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 1 - metal brake rotors - with exhaust filters	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	none (see section A.I.2.a)
	OAC rule 3745-17-07(A)	none (see section A.I.2.b)
	OAC rule 3745-31-05 (PTI 03-9173)	93.1 lbs organic compounds (OC) per day, from coating usage
		6.47 pounds of OC per gallon of coating
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).

#### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

#### II. Operational Restrictions

None

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied.

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

2. 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 emissions from each coating employed (b x c), in pounds; and
  - e. the total OC emissions from all the coatings employed (summation of d for all coatings), in pounds.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC and OC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 93.1 pounds. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the 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):
  - 1.a Emission Limitation:  
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping required in section A.III.1 of this permit.
  - 1.b Emission Limitations:  
93.1 lbs OC/day  
6.47 pounds of OC per gallon of coating  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the daily allowable OC emission limitation and the OC content limitation above based upon the record keeping required in section A.III.2 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings.

### VI. Miscellaneous Requirements

1. The Title V permit application submitted by the permittee indicated that this emissions unit is in violation of OAC rule 3745-31-02 for modifying the emissions unit without first applying for and obtaining a PTI modification. [PTI # 03-9173 was originally issued for the coating of non-metal parts. However, the permittee is currently employing this emissions unit for the coating of metal parts.] Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Paint Booth #2 (R002)  
**Activity Description:** Coating Operation

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 2 - metal and plastic parts - with exhaust filters	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the coatings used for the metal parts
	OAC rule 3745-21-07(G)(2)	on any day when employing any photochemically reactive materials for the coating of non-metal parts, 8 lbs/hour and 40 lbs/day of organic compounds (OC) for the coatings used for the non-metal parts
	OAC rule 3745-17-11(B)	none (see section A.I.2.a)
	OAC rule 3745-17-07(A)	none (see section A.I.2.b)
	OAC rule 3745-31-05 (PTI 03-9228)	93.1 lbs organic compounds (OC) per day, from coating usage

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

## II. Operational Restrictions

1. The permittee shall not employ any 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 collect and record the following information each month for this emissions unit for the coatings used for the metal parts:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied.
2. On any day when coating non-metal parts, the permittee shall collect and record the following information for this emissions unit for the coatings used for the non-metal parts:
  - a. the company identification for each coating and cleanup material employed;
  - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material;
  - c. for each day during which a photochemically reactive material (coating) is employed, the number of gallons of each coating employed;
  - d. for each day during which a photochemically reactive material (coating) is employed, the organic compound content of each coating, in pounds per gallon;
  - e. for each day during which a photochemically reactive material (coating) is employed, the total organic compound emission rate from all the coatings employed [summation of (c x d) for all coatings], in pounds;
  - f. for each day during which a photochemically reactive material (coating) is employed, the number of hours the emissions unit was in operation; and
  - g. the average hourly organic compound emissions rate from all the coatings, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

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 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.

## IV. Reporting Requirements

1. For the coating of metal parts, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### **IV. Reporting Requirements (continued)**

2. For the coating of non-metal parts, the permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. For the days during which a photochemically reactive material (coating) was employed, an identification of each day during which the average hourly organic compound emissions from the coatings used for the non-metal parts exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. For the days during which a photochemically reactive material (coating) was employed, an identification of each day during which the organic compound emissions from the coatings used for the non-metal parts exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
3. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive cleanup material was employed. The report shall be submitted within 45 days after the deviation occurs.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 93.1 pounds, and the actual OC emission rate for each such day.
5. 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 the coatings exceeded the limitation of 6.47 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.
6. These quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c of the 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):
  - 1.a Emission Limitation:  
on any day when coating metal parts, 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the coatings used for the metal parts  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping required in section A.III.1 of this permit.
  - 1.b Emission Limitations:  
on any day when employing any photochemically reactive materials for the coating of non-metal parts, 8 lbs/hour and 40 lbs/day organic compounds for all the coatings used for the non-metal parts  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations based upon the record keeping required in section A.III.2 of this permit.
  - 1.c Emission Limitations:  
93.1 lbs OC/day  
6.47 pounds of OC per gallon of coating  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the OC content limitation and the daily allowable OC emission limitation above based upon the record keeping required in section A.III.3 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings.

## **VI. Miscellaneous Requirements**

1. The Title V permit application submitted by the permittee indicated that this emissions unit is in violation of OAC rule 3745-31-02 for modifying the emissions unit without first applying for and obtaining a PTI modification. [PTI # 03-9228 was originally issued for the coating of non-metal parts. However, the permittee is currently employing this emissions unit for the coating of metal parts and non-metal parts.] Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Paint Booth #3 (R003)  
**Activity Description:** Coating Operation

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 3 - plastic automotive parts - with exhaust filters	OAC rule 3745-21-07(G)(2)	on any day when employing any photochemically reactive materials, 40 lbs organic compounds (OC) per day [The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).]
	OAC rule 3745-17-11(B)	none (see section A.I.2.a)
	OAC rule 3745-17-07(A)	none (see section A.I.2.b)
	OAC rule 3745-31-05 (PTI 03-9994)	4.85 lbs OC per hr  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

#### 2. Additional Terms and Conditions

- 2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County, which is identified as a P-2 county.
- 2.b** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c** The 4.85 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

#### II. Operational Restrictions

1. The permittee shall not employ any 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 collect and record the following information each day for this emissions unit:
  - a. the company identification for each coating and cleanup material employed;
  - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material;
  - c. for each day during which a photochemically reactive material (coating) is employed, the number of gallons of each coating employed;
  - d. for each day during which a photochemically reactive material (coating) is employed, the organic compound content of each coating, in pounds per gallon; and
  - e. for each day during which a photochemically reactive material (coating) is employed, the total organic compound emission rate from all the coatings employed [summation of (c x d) for all coatings], in pounds.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:

For the days during which a photochemically reactive material (coating) was employed, an identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive cleanup material was employed. The report shall be submitted within 45 days after the deviation 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):
  - 1.a Emission Limitation:  
40 lbs OC per day  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the daily allowable OC emission limitation based upon the record keeping required in section A.III.1 of this permit.
  - 1.b Emission Limitation:  
4.85 lbs OC/hr  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the OC emission limitation by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).
2. Formulation data or USEPA Method 24 shall be used to determine the OC content of all the coatings.

## **VI. Miscellaneous Requirements**

1. PTI # 03-9994, as originally issued, did not provide for the use of organic compounds for cleanup materials, although the permittee's PTI application showed that such cleanup materials were being employed. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a written request for an administrative modification to the PTI and an updated Emissions Activities Category (EAC) form 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Paint Booth #4 (R004)  
**Activity Description:** Coating Operation

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 4 - plastic automotive parts - with exhaust filters	OAC rule 3745-21-07(G)(2)	on any day when employing any photochemically reactive materials, 8 lbs organic compounds (OC) per hr, 40 lbs OC per day
	OAC rule 3745-17-11(B)	none (see section A.I.2.a)
	OAC rule 3745-17-07(A)	none (see section A.I.2.b)
	OAC rule 3745-31-05 (PTI 03-13254)	165 lbs OC per month, from cleanup material usage  7.3 tons per year, from coating usage  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

#### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

#### II. Operational Restrictions

1. The permittee shall not employ any 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 collect and record the following information each day for this emissions unit:
  - a. the company identification for each coating and cleanup material employed;
  - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material;
  - c. for each day during which a photochemically reactive material (coating) is employed, the number of gallons of each coating employed;
  - d. for each day during which a photochemically reactive material (coating) is employed, the organic compound content of each coating, in pounds per gallon;
  - e. for each day during which a photochemically reactive material (coating) is employed, the total organic compound emission rate from all the coatings employed [summation of (c x d) for all coatings], in pounds;
  - f. for each day during which a photochemically reactive material (coating) is employed, the number of hours the emissions unit was in operation; and
  - g. the average hourly organic compound emissions rate from all the coatings, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material;
  - b. the volume, in gallons, of each cleanup material employed;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the OC emissions from each cleanup material (b x c), in pounds; and
  - e. the total OC emissions from all the cleanup materials [summation of 'd' for all cleanup materials], in pounds.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:
  - a. For the days during which a photochemically reactive (coating) material (coating) was employed, an identification of each day during which the average hourly organic compound emissions from the coatings exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. For the days during which a photochemically reactive material (coating) was employed, an identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive cleanup material was employed. The report shall be submitted within 45 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 165 pounds (from cleanup materials), and the actual OC emission rate for each such month.
4. These quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c of the 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):
  - 1.a Emission Limitations:  
8 lbs OC per hr, 40 lbs OC per day  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations based upon the record keeping required in section A.III.1 of this permit.
  - 1.b Emission Limitation:  
165 lbs OC per month  
  
Applicable Compliance Method:  
The record keeping requirements in section A.III.2 of this permit shall be used to determine compliance with the monthly allowable OC emission limitation above.
  - 1.c Emission Limitation:  
7.3 ton OC/yr  
  
Applicable Compliance Method:  
The annual allowable OC emission limitation was developed by multiplying the daily allowable OC emission limitation by 365, then dividing by 2000. Therefore, provided compliance is shown with the daily limitation, compliance shall also be shown with the annual limitation.
2. Formulation data or USEPA Method 24 shall be used to determine the OC content of all the coatings.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 4 - plastic automotive parts - with exhaust filters	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene\*

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 778  
 MAGLC (ug/m3): 4476

\* All emissions of toxic compounds in the coatings and cleanup materials were assumed to be toluene which has the lowest TLV of the remaining toxic compounds. Additionally, emissions units L001, R004, R009, and K001 were all included in the modeling for air toxics since they emit the same pollutant and were part of the Permit to Install application.

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

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

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** Paint Booth #9 (R009)  
**Activity Description:** Coating Operation

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 9 - plastic parts - with exhaust filters	OAC rule 3745-21-07(G)	none (see section A.II.1)
	OAC rule 3745-17-11(B)	none (see section A.I.2.a)
	OAC rule 3745-17-07(A)	none (see section A.I.2.b)
	OAC rule 3745-31-05 (PTI 03-13254)	1.1 lbs organic compounds (OC) per hr, 4.8 tons per year, from coating usage  165 lbs OC per month, from cleanup material usage  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 1.1 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

##### II. Operational Restrictions

1. The permittee shall not employ any coating and/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 the following information each month 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.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material;
  - b. the volume, in gallons, of each cleanup material employed;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the OC emissions from each cleanup material employed (b x c), in pounds; and
  - e. the total OC emissions from all cleanup materials [summation of 'd' for all cleanup materials], in pounds.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each month during which a photochemically reactive coating and/or cleanup material was employed. The report shall be submitted within 45 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 165 pounds (from cleanup materials), and the actual OC emission rate for each such month.

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):
  - 1.a Emission Limitation:  
1.1 lbs OC/hr  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).
  - 1.b Emission Limitation:  
165 lbs OC per month  
  
Applicable Compliance Method:  
The record keeping requirements in section A.III.2 of this permit shall be used to determine compliance with the monthly allowable OC emission limitation above.
  - 1.c Emission Limitation:  
4.8 tons OC/yr  
  
Applicable Compliance Method:  
The annual allowable OC emission limitation was developed by multiplying the hourly allowable OC limitation by 8760, then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.

## **VI. Miscellaneous Requirements**

1. The Title V permit application submitted by the permittee indicated that this emissions unit is in violation of OAC rule 3745-31-02 for modifying the emissions unit without first applying for and obtaining a PTI modification. [PTI # 03-13254 was originally issued for the coating of non-metal parts. However, the permittee is currently employing this emissions unit for the coating of metal parts.] Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth 9 - plastic parts - with exhaust filters	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene\*

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 778

MAGLC (ug/m3): 4476

\* All emissions of toxic compounds in the coatings and cleanup materials were assumed to be toluene which has the lowest TLV of the remaining toxic compounds. In addition, emissions units L001, R004, R009, and K001 were all included in the modeling for air toxics since they emit the same pollutant and were part of the Permit to Install application.

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

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

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

Facility Name: **BDJ Industries, Inc.**  
Facility ID: **03-86-00-0060**

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