



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
HAMILTON COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No: 14-05416**

**DATE: 5/6/2003**

Rumpke Sanitary Landfill, Inc  
John Butler  
10795 Hughes Rd  
Cincinnati, OH 452514598

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 5/6/2003  
Effective Date: 5/6/2003**

**FINAL PERMIT TO INSTALL 14-05416**

Application Number: 14-05416  
APS Premise Number: 1431092049  
Permit Fee: **\$400**  
Name of Facility: Rumpke Sanitary Landfill, Inc  
Person to Contact: John Butler  
Address: 10795 Hughes Rd  
Cincinnati, OH 452514598

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**10795 Hughes Rd  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**paint shop container booth and paint shop truck booth - modification to PTI 14-02888.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 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, 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.
- 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 of federally enforceable 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 made to the appropriate Ohio EPA District Office or local air agency. 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. See B.9 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. 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 shall be submitted pursuant to 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 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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## 8. 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.

## 9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
  - 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.

## 10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing

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**Issued: 5/6/2003**

Facility ID: **1431092049**

operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

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

#### **12. 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.

## **B. State Only Enforceable Permit To Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. Permit Transfers**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

### **4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

## **5. Construction of New Sources(s)**

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

## **6. Public Disclosure**

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

## **7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. **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.

C. **Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	20.75
Acetone	9.24
PM/PM10	4.82

Rumpke Sanitary Landfill, Inc  
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**Issued: 5/6/2003**

Facility ID: **1431092049**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K001 - Paint Shop Container Booth, with Dry Filtration System	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-21-09(U)(1)(c)

OAC rule 3745-17-11(B)

Applicable Emissions  
Limitations/Control  
Measures

70.0 lbs of volatile organic compounds (VOC)/day from coatings

12.6 TPY of VOC from coatings

33.0 lbs acetone/day from cleanup materials

4.62 TPY of acetone from cleanup materials

0.551 lb/hour PM<sub>10</sub>

2.41 TPY PM/PM<sub>10</sub>

See Section A.II. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B), and 3745-21-09(U)(1)(c).

Particulate emissions (PE\*) shall not exceed 0.551 lb/hr (based on Table I of OAC rule 3745-17-11).

\* PE=PM

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified

by rule.

3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents, as applied

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage limits, and the coating VOC content limitation.

**II. Operational Restrictions**

1. The maximum coating usage for this emissions unit shall not exceed 20 gallons per day and 7,200 gallons per year, excluding water and exempt solvents.
2. The maximum cleanup material (acetone) usage for this emissions unit shall not exceed 5 gallons per day and 1,400 gallons per year.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. The company identification for each coating material employed.
  - b. The number of gallons of each coating employed, excluding water and exempt solvents.
  - c. The VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
  - d. The total VOC emissions [the summation of (b x c) for all coatings], in pounds.
  - e. The total coating usage for all the coatings employed (the summation of b for all coatings), in gallons, excluding water and exempt solvents.
  - f. The name and identification of each cleanup material employed.
  - g. The number of gallons of each cleanup material employed.
  - h. The density of each cleanup material, in pounds per gallon.
  - i. The total emissions from all cleanup materials (g x h), in pounds.

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

**IV. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Any exceedances of the daily coatings usage restriction of 20 gallons, excluding water and exempt solvents.
  - b. Any exceedances of the daily acetone usage restriction of 5 gallons.
  - c. Any exceedances of the daily VOC emission limitation of 70.0 pounds.
  - d. Any exceedances of the daily acetone emission limitation of 33.0 pounds.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

- 2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.
- 4. The permittee shall submit an annual report which specifies the total annual coating and cleanup material usage in this emissions unit. These reports shall be submitted by January 31 of each year.

**V. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section

A.III.1 of this permit. USEPA Method 24 shall be used to determine the VOC content for the coatings. If, pursuant to, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Emission Limitation:

70.0 lbs of VOC/day from coatings

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section A.III.1 of this permit.

3. Usage Restrictions:

20 gallons per day and 7,200 gallons per year of coatings usage, excluding water and exempt solvents; 5 gallons per day and 1,400 gallons per year of acetone usage.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section A.III.1 of this permit.

4. Emission Limitation:

20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

5. Emission Limitation:

0.551 lb of PE and PM10/hr

Applicable Compliance Method:

Compliance with the hourly allowable PE and PM10 limitation may be determined in accordance with the following method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

where:

$E$  = PE rate (lbs/hr)

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

$CE$  = control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5 in Appendix A of 40 CFR, Part 60.

6. Emission Limitation:

2.41 TPY of PE and PM

Applicable Compliance Method:

Compliance shall be determined by multiplying 0.551 lb/hour by 8760 hours per year and dividing by 2000 pounds per ton.

7. Emission Limitation:

12.6 TPY VOC

Applicable Compliance Method:

Compliance shall be determined by a summation of the daily VOC emissions from term A.III.1.

8. Emission Limitation:

33.0 lbs acetone/day from cleanup materials

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term A.III.1.

9. Emission Limitation:

20

Rumpl

PTI A<sub>1</sub>

**Issued: 5/6/2003**

Emissions Unit ID: K001

4.62 TPY of acetone from cleanup materials

Applicable Compliance Method:

Compliance shall be determined by a summation of the daily acetone emissions from term A.III.1.

## **VI. Miscellaneous Requirements**

1. The terms and conditions in this permit to install shall supersede permit to install 14-02888 issued on March 17, 1993 for this emissions unit.

Issued: 5/6/2003

**B. State Only Enforceable Section**

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

1. The specific operations(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 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>
K001 - Paint Shop Container Booth, with Dry Filtration System		

**2. Additional Terms and Conditions**

2.a none

**II. Operational Restrictions**

none

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

1. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (ug/m<sup>3</sup>): 1,188,000

Maximum Hourly Emission Rate (lbs/hr): 33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,284

MAGLC (ug/m<sup>3</sup>): 28,286

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for 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 with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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 - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K002 - Paint Shop Truck Booth, with Dry Filtration System	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-21-09(U)(1)
	OAC rule 3745-17-11(B)	

Applicable Emissions  
Limitations/Control  
Measures

50.0 lbs of volatile organic compounds (VOC)/day from coatings

8.15 TPY VOC from coatings

33.0 lbs acetone/day from cleanup materials

4.62 TPY of acetone from cleanup materials

0.551 lb/hour PM10

2.41 TPY PM/PM10

See Sections A.I.2 and A.II. below.

The requirement of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(B).

Particulate emissions (PE\*) shall not exceed 0.551 lb/hr (based on Table I of OAC rule 3745-17-11).

\*PE=PM10

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-

minute average, except as specified by rule.

Exempt, pursuant to OAC rule 3745-21-09(U)(2)(c) for used motor vehicle refinishing.

**2. Additional Terms and Conditions**

- 2.a** The VOC content of the coatings employed shall not exceed 4.53 lbs of VOC/gallon of coating, excluding water and exempt solvents, based on a monthly, volume-weighted average, as applied.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage limitations, and the coating VOC content limitation.

**II. Operational Restrictions**

1. The maximum coating usage for this emissions unit shall not exceed 10 gallons per day and 3,600 gallons per year, excluding water and exempt solvents.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
3. The maximum cleanup material (acetone) usage for this emissions unit shall not exceed 5 gallons per day and 1,400 gallons per year.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The company identification for each coating material employed.
  - b. The number of gallons of each coating employed, excluding water and exempt solvents.
  - c. The VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
  - d. The total VOC emissions [the summation of (b x c) for all coatings], in pounds.
  - e. The total coating usage for all the coatings employed (the summation of b for all coatings), in gallons, excluding water and exempt solvents.
  - f. The name and identification of each cleanup material employed.
  - g. The number of gallons of each cleanup material employed.
  - h. The density of each cleanup material, in pounds per gallon.

- i. The total emissions from all cleanup materials (g x h), in pounds.
2. The permittee shall collect and record the the following information each month for this emissions unit:
  - a. The total number of gallons for all the coatings employed (the summation of the daily gallon usage rates, from Section A.III.1.e, for the calendar month).
  - b. The total VOC emissions for all the coatings employed (the summation of the daily VOC emission rates, from Section A.III.1.d, for the calendar month).
  - c. The monthly, volume-weighted average VOC content for all the coatings employed in this emissions unit (b/a).
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following :
  - a. Any exceedances of the daily coating usage restrictions of 10 gallons, excluding water and exempt solvents.
  - b. Any exceedances of the daily VOC limitation of 50.0 pounds;
  - c. Any exceedances of the daily acetone usage restrictions of 5 gallons.
  - d. Any exceedances of daily acetone emission limitation of 33.0 pounds.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.
4. The permittee shall submit annual reports which specify the total annual coating and cleanup material usage in this emissions unit. These reports shall be submitted by January 31 of each

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year.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

VOC Content Limitation:

4.53 lbs of VOC/gallon of coating, excluding water and exempt solvents, based on a monthly volume weighted average.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section A.III.2 of this permit.

USEPA Method 24 shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating and/or cleanup materials, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating and/or cleanup materials to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Emission Limitation:

50.0 lbs of VOC/day

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section A.III.1. of this permit.

3. Emission Limitation:

10 gallons per day and 3600 gallons per year of coatings usage, excluding water and exempt solvents

5 gallons per day and 1,400 gallons per year of acetone usage

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Sections A.III.1.

4. Emission Limitation:

20% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

5. Emission Limitation:

0.551 lb of PE/hr

Applicable Compliance Method:

Compliance with the hourly allowable PE and PM10 limitation may be determined in accordance with the following method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

where:

E = PE rate (lbs/hr)

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

CE = control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5 in Appendix A of 40 CFR, Part 60.

6. Emission Limitation:

2.41 TPY of PE and PM

Applicable Compliance Method:

Compliance shall be determined by multiplying 0.551 lb/hour by 8760 hours per year and dividing

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by 2000 pounds per ton.

7. Emission Limitation:

8.15 TPY VOC

Applicable Compliance Method:

Compliance shall be determined by a summation of the daily VOC emissions from term A.III.1.

8. Emission Limitation:

33.0 lbs acetone/day from cleanup materials

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term A.III.1.

9. Emission Limitation:

4.62 TPY of acetone from cleanup materials

Applicable Compliance Method:

Compliance shall be determined by a summation of the daily acetone emissions from term A.III.1.

**VI. Miscellaneous Requirements**

1. The terms and conditions in this permit to install shall supersede permit to install 14-02888 issued on March 17, 1993 for this emissions unit.

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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**

2.a none

**II. Operational Restrictions**

none

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

1. The permit to install for this emissions unit (K002) was evaluated based on the actual materials (typically coatings and cleanup 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (ug/m3): 1,188,000

Maximum Hourly Emission Rate (lbs/hr): 33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,284

MAGLC (ug/m3): 28,286

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for 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 with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

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**IV. Reporting Requirements**

none

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none