Facility ID: 1409000070 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409000070 Emissions Unit ID: P011 Issuance type: Final State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P011 - Nozzle Flow Test Line	OAC rule 3745-31-05(A)(3) (PTI 14-05434)	Organic Compound (OC) emissions shall not exceed 3.2 pounds per hour, 38.4 pounds per day, and 4.8 tons per year.

2. **Additional Terms and Conditions**

   (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC emissions limitations.

B. **Operational Restrictions**

1. None

C. **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 organic solvent employed.

   b. The number of gallons of each organic solvent evaporated, in gallons per day.

   c. The OC content of each organic solvent, in pounds per gallon.

   d. The total daily OC emissions rate calculated by taking the sum of (b) times (c) for each organic solvent employed, in pounds per day.

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

   f. The average hourly OC emissions from all organic solvents employed, in pounds [i.e., the quotient of (d) divided by (e)].

2. The permittee shall calculate and record the total annual OC emissions from all organic solvents employed in this emissions unit, [i.e., the sum of the daily OC emission rates from the organic solvents in term and condition C.1.d], for the calendar year.

3. The permit to install for emissions units P009, P010, P011, and P012, combined, 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 these emissions units 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: Stoddard Solvent

   TLV (ug/m3): 572,600

   Maximum Hourly Emission Rate from P009, P010, P011 and P012 combined (lbs/hr): 12.8

Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 1,037

Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 13,633

4. 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, 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, then the permittee shall obtain a final permit to install prior to the change.

5. 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.

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that the emissions unit has exceeded the hourly, daily or annual OC emissions limitations specified in Section A.1. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

E. **Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 of these terms and conditions shall be determined by the following methods:
   Emissions Limitations:

   OC emissions shall not exceed 3.2 pounds per hour, 38.4 pounds per day, and 4.8 tons per year.

   Applicable Compliance Method:

   The emissions limitations outlined above are based upon permittee-supplied engineering data and emissions rates contained in Permit to Install application #14-03545, submitted July 11, 1994, for similar emissions units at the permittee's facility. Compliance with these emissions limitations shall be determined by the record keeping requirements in Sections C.1 and C.2.

2. US EPA Method 24 or formulation data shall be used to determine the OC content of the organic solvents.

F. **Miscellaneous Requirements**

1. None