

Facility ID: 1409000654 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: 1409000654 Emissions Unit ID: R014 Issuance type: Final State Permit To Operate

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R014-Resin Coating Operation	OAC rule 3745-31-05(A)(3) (PTI 14-05909)	Organic Compound (OC) emissions from the application of coatings in this emissions unit shall not exceed 18.0 pounds per day and 3.29 tons per year.
		See term and condition A.2.b.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See section B.3.
	OAC rule 3745-31-05(C)	See terms and conditions A.2.a and A.2.e.
	Synthetic minor to avoid 40 CFR 63 Subpart MMMM and Nonattainment New Source Review	See sections B.1 and B.2.
	ORC 3704.03 (T)(4)	See term and condition A.2.d.
	ORC 3704(F)(4)(d)	See sections C.4 and C.5.

**2. Additional Terms and Conditions**

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater), R013 (Dip Coating associated with Tumbling) and R014 (Resin Coating Operation) and all de minimus emissions units (as defined in OAC rule 3745-15-05) and emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently and future to be installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with existing air contaminant sources limitation upon permit issuance.

The organic compound (OC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.0 pounds of OC per gallon of coating.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Volatile Organic Compounds (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.

The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater), R013 (Dip Coating associated with Tumbling) and R014 (Resin Coating Operation) and all de minimus emissions units (as defined in OAC rule 3745-15-05) and emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently and future to be installed air contaminant sources, combined, shall not exceed 51.30 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R014 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R014 combined shall not exceed 7200 gallons, after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

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

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The OC content of each coating, in pounds per gallon, as applied.
  - e. The total OC emissions from coatings in pounds per day (b x d).
2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.e, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month (b x d).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.
  - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
  - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
  - a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
  - k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.

I. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit R014 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) 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: methanol  
 TLV (ug/m3): 262,086  
 Maximum Hourly Emission Rate (lbs/hr): 2.06  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 240  
 MAGLC (ug/m3): 6240

5. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings (i.e., OC contents). 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term and condition A.2.e or the coating or cleanup usage limitation in sections B.1 and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

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

#### E. Testing Requirements

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

Emission Limitations:  
 Organic Compound (OC) emissions from the application of coatings in this emissions unit shall not exceed 18.0 pounds per day and 3.29 tons per year.

Applicable Compliance Method:  
 The daily OC emissions for coatings shall be determined by multiplying the OC content of applied coatings by the daily application rate. Compliance shall be based on the recordkeeping requirements as specified in section

C.1. Compliance with the annual emissions limitation shall be determined by the sum of the dialy records over the preceding calendar year.

Emission Limitation:

The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater), R013 (Dip Coating associated with Tumbling) and R014 (Resin Coating Operation) and all de minimus emissions units (as defined in OAC rule 3745-15-05) and emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently and future to be installed air contaminant sources, combined, shall not exceed 51.30 TPY.

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emission Limitations:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAPs emission limitations shall be based on the record keeping requirements established in section C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
  3. Compliance with the operational restriction in section B.1 shall be determined by the record keeping required in section C.2.
  4. Compliance with the operational restriction in section B.2 shall be determined by the record keeping required in section C.2.
  5. Compliance with the operational restriction in section B.3 shall be determined by the record keeping required in section C.1.
  6. Formulation data shall be used to determine the OC content of the coatings employed.
- F. **Miscellaneous Requirements**
1. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1, through C.3, D, and E.