

Facility ID: 1409000675 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: 1409000675 Emissions Unit ID: R001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
roller coating & rack drying w/thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 14-2185)	193.4 lbs of organic compound (OC) emissions/day, including OC emissions from the use of cleanup materials 12 tons per year (TPY) of OC emissions, including OC emissions from the use of cleanup materials See Section A.2 below.
	OAC rule 3745-21-07(G)(2)	Exempt, see Section B.1 below.

2. **Additional Terms and Conditions**
 - (a) The permittee shall operate a thermal incinerator capable of maintaining an overall OC control efficiency of at least 74.1%, by weight.

B. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The maximum coating usage shall not exceed 150 gallons per day and 18,600 gallons per year.
3. The maximum cleanup material usage shall not exceed 18.0 gallons per day and 2,240 gallons per year.
4. The facility shall store waste coatings and cleanup materials in containers with tight-fitting lids to prevent evaporation loss of OC.
5. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when this emissions unit is in operation, shall not be less than 700 degrees Fahrenheit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when this emissions unit was in operation, was less than 700 degrees Fahrenheit.
 - b. A log of the downtimes for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The facility shall maintain daily records of the following information for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount, in gallons, of each coating employed;
 - c. the amount, in gallons, of all coatings employed;
 - d. the amount, in gallons, of each cleanup material employed;

- e. the amount, in gallons, of all cleanup materials employed;
 - f. the OC content, in pounds of OC per gallon, as applied, for each coating;
 - g. the OC content, in pounds of OC per gallon, as applied, for each cleanup material; and
 - h. the total OC emissions, in pounds [(summation of (b) x (f) for all coatings employed, plus the summation of (d) x (g) for all cleanup materials employed) x (1 - the fractional overall control efficiency of the thermal incinerator from the most recent test that demonstrated compliance with the overall control efficiency limitation)].
- 3. The permittee shall maintain annual records of the following information for this emissions unit:
 - a. the total amount, in gallons, of all coatings employed during the calendar year (summation of C.2.c for each day of the calendar year);
 - b. the total amount, in gallons, of all cleanup materials employed during the calendar year (summation of C.2.e for each day of the calendar year); and
 - c. the total OC emissions, in tons, for the calendar year (summation of C.2.h for each day of the calendar year and divided by 2,000 lbs/ton).

D. Reporting Requirements

- 1. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an exceedance of the daily material usage restrictions or the daily OC emission limitation. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs and shall also include the probable cause of the exceedance and any corrective actions taken and preventive measures taken to avoid such occurrences in future.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature of the thermal incinerator did not comply with the temperature limitation specified in Section B.5.
- 3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
- 4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total amount, in gallons, of all coatings and cleanup materials employed during the calendar year for this emissions unit. In addition, the permittee shall submit annual reports that specify the total OC emissions, in tons, from this emissions unit for the calendar year. The reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the OC emission limitations and material usage restrictions specified in Sections A and B shall be determined by the following methods:
 OC Emission Limitation: 193.4 lbs of OC emissions/day; 12 TPY of OC emissions

 Applicable Compliance Method: Compliance with the daily OC emission limitation shall be determined by the record keeping requirements specified in Section C.2. Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in Section C.3.
 Material Usage Restrictions: 150 gallons/day and 18,600 gallons/year for coatings; 18.0 gallons/day and 2,240 gallons/year for cleanup materials

 Applicable Compliance Method: Compliance with the daily material usage restrictions shall be determined by the record keeping requirements specified in Section C.2. Compliance with the annual material usage restrictions shall be determined by the record keeping requirements specified in Section C.3.
- 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency of not less than 74.1%, by weight, for OC.
 - c. The following test methods shall be employed to demonstrate compliance with the overall control efficiency for the thermal incinerator.

 The capture efficiency shall be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the U.S. EPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The overall control system efficiency for OCs, shall be the product of the capture efficiency and the destruction efficiency of the thermal incinerator.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

F. **Miscellaneous Requirements**

1. None