

Facility ID: 1409000675 Issuance type: Final State Permit To Operate

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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: P001 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>
P001 - Silk screen printing operation - modification	OAC rule 3745-31-05(A)(3) (PTI 14-02185)	Organic compound (OC) emissions shall not exceed 28.4 lbs/hr, 298 lbs/day OC, and 18.3 TPY OC, based on a rolling, 12-month summation. See term A.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	See term A.2.b.
	OAC rule 3745-31-05(C)	See term A.2.d.

2. Additional Terms and Conditions

- (a) The daily volume-weighted average organic compound (OC) content of all coatings employed in this emissions unit shall not exceed 4.38 pounds of OC per gallon of coating. On any day in which a photochemically reactive material (PRM), as defined in OAC rule 3745-21-01(C) (5), is employed in this emissions unit the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the usage and emission limitations, the OC content limitations, and usage restrictions. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, N001, P001, P002, P003, P004, and R001 including other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, 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 hourly mass emission limitation listed in term A.1 of 28.4 is a maximum value and therefore hourly record keeping requirements to validate that value is not required.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 68 gallons per day.
2. The maximum annual coating usage for this emissions unit shall not exceed 8356 gallons per year based upon a rolling, 12-month summation.
3. The permittee shall store all waste coatings in containers with tight fitting lids to prevent evaporation loss.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day:
 - a. The name and company identification of each coating, as applied.
 - b. The OC content of each coating employed, as applied, in pounds per gallon.
 - c. The volume of each coating employed, in gallons, as applied.

- d. The OC emissions from each coating employed, in pounds [i.e., (C.1.b)x(C.1.c)], for each coating identified in C.1.a].
 - e. The total volume of all coatings employed, in gallons, as applied (i.e., the sum of the volumes recorded in C.1.c for all coatings identified in C.1.a).
 - f. The daily volume-weighted average OC content for all coatings, in pounds per gallon (average), as applied [i.e., the sum of (C.1.b)x(C.1.c) for all the coatings identified in C.1.a, divided by C.1.e].
2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit.
 - b. A record, for each liquid organic material employed in this emissions unit, that indicates whether or not the liquid organic material is a photochemically reactive material as defined in rule OAC 3745-21-01(C)(5).
 3. The permittee shall collect and record the following information for each day any photochemically reactive materials are employed:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The organic compound content of each coating, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings in pounds per day (b x c).
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings, i.e., (d)/(e), 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 definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]
 4. The permittee shall maintain monthly records of the following information:
 - a. The coating usage for each month.
 - b. The rolling, 12-month summation of the coating usage figures.
 5. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.d:
 - a. The name and identification number of each coating material employed;
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating material* in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content of each coating material 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 material* employed;
 - e. The name and identification of each cleanup material employed;
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. The number of gallons of each cleanup material employed;
 - i. The total individual HAP usage for each HAP from all coating material and cleanup material employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP usage from all coating material and cleanup material 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 cleanup material];
 - k. The updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - l. The updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
 6. The permit to install for these emissions unit 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 Acceptable Ground-Level Concentration (MAGLC).

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

Pollutant: VM&P Naptha
 TLV (ug/m3): 1,400,000
 Maximum Hourly Emission Rate (lbs/hr): 12.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 28.9
 MAGLC (ug/m3): 33,304

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 submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the photochemically reactive coatings exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the photochemically reactive coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the daily volume-weighted average OC content or daily coating usage limit exceeds the applicable limitation. 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 HAP usage limitations set forth in term A.2.d. The permittee shall submit semi-annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively). If no exceedances occurred during the reporting period then a report is required stating so.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation.
5. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 shall be demonstrated by the following methods:
 - a. Emission Limitation(s):
 Organic compound (OC) emissions shall not exceed 28.4 lbs/hr and 298 lbs/day OC.
 Applicable Compliance Method:
 Compliance with the hourly and daily OC limitations shall be demonstrated by multiplying the hourly or daily usage in gallons per hour by the OC content in pounds per gallon.
 - b. Emission Limitation:
 Organic compound (OC) emissions shall not exceed 18.3 TPY, based on a rolling 12-month summation.
 Applicable Compliance Method:
 Compliance with the yearly OC limitation shall be demonstrated by the record keeping in section C.4.
2. Compliance with the OC content limitation for the coatings cited in term and condition A.2.a shall be demonstrated by the record keeping in section C.1.

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

3. Compliance with the coating usage limitations in sections B.1 and B.2 shall be demonstrated by the record keeping in sections C.1 and C.4.
 4. Compliance with the HAP emissions limitations cited in term and condition A.2.d shall be demonstrated by the recordkeeping in section C.5.
 5. Compliance with the photochemically reactive material limitation in term and condition A.2.b shall be demonstrated by the record keeping in term and section C.3.
- F. **Miscellaneous Requirements**
1. None