

Facility ID: 1409000716 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: 1409000716 Emissions Unit ID: K001 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>   |
|---|---|--|
| open air brushing and spraying operation      | OAC rule 3745-31-05(A)(3)<br>(PTI 14-04716)               | For coating non-metal parts:<br>238.4 lbs of organic compound (OC) emissions/day<br>19.5 tons per year (TPY) of OC emissions                                       |
|   |   | For coating metal parts:<br>34.7 lbs of VOC emissions/day<br>2.84 TPY of VOC emissions   |
|   |   | For cleanup materials:<br>67.1 lbs of OC emissions/day<br>5.64 TPY of OC emissions   |
|   | OAC rule 3745-21-07(G)(2)<br>OAC rule 3745-21-09(U)(1)(c) | Exempt, See Section B.7 below.<br>The VOC content specified by this rule is less stringent than the VOC content established pursuant to OAC rule 3745-31-05(A)(3). |
|   | OAC rule 3745-31-05(D)                                    | See Sections A.2.a and B.1 through B-6 below.  |

**2. Additional Terms and Conditions**

- (a) The total allowable usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9\* TPY for any single HAP and 24.9\* TPY for any combination of HAPs. Compliance with the above emission limitations shall be based on a rolling, 12-month summation.
 

\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

**B. Operational Restrictions**

1. The maximum coating usage for this emissions unit shall not exceed 40 gallons per day and 6,545 gallons per year, including water and exempt solvents, for coating non-metal parts. The annual coating usage restriction shall be based upon a rolling, 12-month summation.
2. The maximum coating usage for this emissions unit shall not exceed 15 gallons per day and 2,460 gallons per year, excluding water and exempt solvents, for coating metal parts. The annual coating usage restriction shall be based upon a rolling, 12-month summation.
3. The maximum cleanup material usage for this emissions unit shall not exceed 10 gallons per day and 1,670 gallons per year. The annual cleanup material usage restriction shall be based upon a rolling, 12-month summation.
4. The OC content of any coating employed when coating non-metal parts in this emissions unit shall not exceed 5.96 pounds per gallon, as applied, including water and exempt solvents.
5. The VOC content of any coating employed when coating metal parts in this emissions unit shall not exceed 2.31 pounds per gallon, as applied, excluding water and exempt solvents.
6. The OC content of any cleanup material employed for this emissions unit shall not exceed 6.75 pounds per gallon.

7. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is prohibited in this emissions unit, except for any material used in the coating of metal parts.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day when coating metal parts for this emissions unit:
    - a. the name and identification number of each coating employed;
    - b. the VOC content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents;
    - c. the volume, in gallons, of each coating employed, excluding water and exempt solvents;
    - d. the total volume, in gallons, of all coatings employed, excluding water and exempt solvents [summation of (c) for all coatings employed during the day]; and
    - e. the daily VOC emissions, in pounds [summation of (b) x (c) for all coatings employed during the day].
  2. The permittee shall collect and record the following information each day when coating non-metal parts for this emissions unit:
    - a. the name and identification number of each coating employed;
    - b. a record of each liquid organic material employed in this emissions unit indicating whether or not the liquid organic material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
    - c. the OC content of each coating, in pounds per gallon, as applied, including water and exempt solvents;
    - d. the volume, in gallons, of each coating employed;
    - e. the total volume, in gallons, of all coatings employed [summation of (d) for all coatings employed during the day]; and
    - f. the daily OC emissions, in pounds [summation of (c) x (d) for all coatings employed during the day].
  3. The permittee shall collect and record the following information each day for the cleanup materials employed in this emissions unit:
    - a. the company identification of each cleanup material employed;
    - b. a record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
    - c. the OC content of each cleanup material employed, in pounds per gallon;
    - d. the volume, in gallons, of each cleanup material employed;
    - e. the total volume, in gallons, of all cleanup materials employed [summation of (d) for cleanup materials employed during the day]; and
    - f. the daily OC emissions, in pounds [summation of (c) x (d) for all cleanup materials employed during the day].
  4. The permittee shall maintain monthly records of the following information for this emissions unit:
    - a. the total volume, in gallons, of all coatings employed for metal parts (summation of C.1.d for all days of the calendar month);
    - b. the total volume, in gallons, of all coatings employed for non-metal parts (summation of C.2.e for all days of the calendar month);
    - c. the total volume, in gallons, of all cleanup materials employed (summation of C.3.e for all days of the calendar month);
    - d. the updated rolling, 12-month summation of all coatings employed for metal parts, in gallons;
    - e. the updated rolling, 12-month summation of all coatings employed for non-metal parts, in gallons; and
    - f. the updated rolling, 12-month summation of all cleanup materials employed, in gallons.
  5. The permittee shall collect and record the following information each month for the entire facility:
    - a. the name and identification number of each coating employed;
    - b. the individual 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 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 coatings and cleanup materials 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 (and divided by 2,000 lbs/ton if the units are in tons)];

j. the total combined HAP emissions from all coatings and 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 cleanup material (and divided by 2,000 lbs/ton if the units are in tons)];

k. the updated rolling, 12-month summation of usage for each individual HAP emissions\*\*, in 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 emissions\*\*, in pounds or tons. This shall include the information for the current month and 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 HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

6. The permit to install for this emissions unit was evaluated based on the actual materials employed (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. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each toxic 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:

Pollutant: Stoddard Solvent  
 TLV (ug/m3): 572.6  
 Maximum Hourly Emission Rate (lbs/hr): 12.71  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 2,129.0  
 MAGLC (ug/m3): 13,633.3

Physical changes to or in the method of operation of the emissions unit after its 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee shall not make the change. Changes that can affect the parameters used in the "Air Toxics 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 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 Toxics Policy" will be satisfied with the above changes, 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 Toxics Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics 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 Toxics Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record identifying any of the following:
- an exceedance of the OC/VOC content limitations for any coating and/or cleanup material employed;
  - an exceedance of the daily coating and/or cleanup material usage limitations;
  - an exceedance of the daily OC/VOC emission limitations for coatings and/or cleanup materials; and
  - each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was

employed in this emissions unit, except for any material used in the coating of metal parts.

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 exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. an identification of all exceedances of the rolling, 12-month usage limitations for all coatings and cleanup materials employed in this emissions unit (i.e., coatings for metal parts, coatings for non-metal parts and cleanup materials); and
  - b. an identification of all exceedances of the rolling, 12-month HAP emission limitations of 9.9 tons and 24.9 tons for any single HAP and combination of HAPs, respectively.
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 summarize the following:
  - a. the total number of gallons of all coatings employed for metal parts in this emissions unit for the previous calendar year;
  - b. the total number of gallons of all coatings employed for non-metal parts in this emissions unit for the previous calendar year; and
  - c. the total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

These reports shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the OC, VOC and HAP emission limitations, the OC and VOC content limitations, and the coating and cleanup material usage restrictions shall be determined by the following methods:  
 OC Emission Limitations: 238.4 lbs/day and 19.5 TPY of OC emissions from coating non-metal parts  
  
 Applicable Compliance Method: Compliance with the daily OC emission limitation for coating non-metal parts shall be determined by the record keeping requirements specified in Section C.2. Compliance with the annual OC emission limitation is ensured if compliance is maintained with the OC content limitation and the annual coating usage restriction.  
 VOC Emission Limitations: 34.7 lbs/day and 2.84 TPY of VOC emissions from coating metal parts  
  
 Applicable Compliance Method: Compliance with the daily VOC emission limitation for coating metal parts shall be determined by the record keeping requirements specified in Section C.1. Compliance with the annual VOC emission limitation is ensured if compliance is maintained with the VOC content limitation and the annual coating usage restriction.  
 OC Emission Limitations: 67.1 lbs/day and 5.64 TPY of OC emissions from cleanup materials  
  
 Applicable Compliance Method: Compliance with the daily OC emission limitation for cleanup materials shall be determined by the record keeping requirements specified in Section C.3. Compliance with the annual OC emission limitation is ensured if compliance is maintained with the OC content limitation and the annual cleanup material usage restriction.  
 HAP Emission Limitations: 9.9 TPY for any single HAP; 24.9 TPY for any combination of HAPs, based upon a rolling, 12-month summation  
  
 Applicable Compliance Method: Compliance with the HAP emission limitations shall be determined by the record keeping requirements specified in Section C.5.  
 VOC Content Limitation: 2.31 lbs/gallon, excluding water and exempt solvents, for coating metal parts  
  
 Applicable Compliance Method: Compliance with the VOC content limitation shall be determined by the record keeping requirements specified in Section C.1. If, pursuant to Section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.  
 OC Content Limitation: 5.96 lbs/gallon for coating of non-metal parts, including water and exempt solvents, for coating non-metal parts  
  
 Applicable Compliance Method: Compliance with the OC content limitation shall be determined by the record keeping requirements specified in Section C.2. Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of any coating and cleanup material employed in this emissions unit.  
 OC Content Limitation: 6.75 lbs/gallon for cleanup materials  
  
 Applicable Compliance Method: Compliance with the OC content limitation shall be determined by the record keeping requirements specified in Section C.3. Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.  
 Material Usage Restrictions: 40 gallons/day and 6,545 gallons/year, including water and exempt solvents, for coating non-metal parts, based upon a rolling, 12-month summation; 15 gallons/day and 2,460 gallons/year, excluding water and exempt solvents, for coating metal parts, based upon a rolling, 12-month summation; 10 gallons/day and 1,670 gallons/year for cleanup materials, based upon a rolling, 12-month summation  
  
 Applicable Compliance Method: Compliance with the daily coating usage restriction for metal parts shall be determined by the record keeping requirements specified in Section C.1. Compliance with the annual coating usage restriction for metal parts shall be determined by the record keeping requirements specified in Section C.4.

Compliance with the daily coating usage restriction for non-metal parts shall be determined by the record keeping requirements specified in Section C.2. Compliance with the annual coating usage restriction for non-metal parts shall be determined by the record keeping requirements specified in Section C.4.

Compliance with the daily cleanup material usage restriction shall be determined by the record keeping requirements specified in Section C.3. Compliance with the annual cleanup material usage restriction shall be determined by the record keeping requirements specified in Section C.4.

F. **Miscellaneous Requirements**

1. None