

Facility ID: 1409000870 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: 1409000870 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>
Priming and Topcoat Operation	OAC rule 3745-31-05(A)(3) (PTI 14-04381)	41.7 lbs of OC/hr*, 37.3 TPY of OC as a rolling, 12-month summation, 0.68 lb of PM/hr*, 2.97 TPY of PM 0.68 lb of particulate matter with a diameter of 10 microns or smaller (PM10)/hr*, 2.97 TPY of PM10, 2.55 lbs of NOx/hr*, 11.17 TPY of NOx 0.02 lb of SO2/hr*, 0.07 TPY of SO2 0.54 lb of CO/hr*, 2.35 TPY of CO
		These emissions limits include emissions from natural gas burners.
		*These hourly emission limits are based on the maximum coating usage and the maximum capacity of the natural gas burners and, thus, hourly record keeping is not required.
		See Term A.2.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limit established by this rule is less stringent than that established by OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(2)(c)	Same as VOC limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The OC emissions shall not exceed 37.3 tons per year as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emissions specified in the following table:

Month	Maximum Allowable OC Emissions (tons)
1-1	3.1
1-2	6.2
1-3	9.3
1-4	12.4
1-5	15.5
1-6	18.6
1-7	21.8
1-8	24.9
1-9	28
1-10	31.1

1-11 34.2

1-12 37.3

After the first 12 calendar months of operation, compliance with the annual OC emission limitation shall be based upon a rolling, 12-month summation of the OC emission figures.

The OC content of all coatings used for metal pre-treatment/etch primer shall not exceed 6.5 pounds per gallon (as applied, including water and exempt solvents), and 6.1 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The OC content of all coatings used for primer surfacer shall not exceed 4.8 pounds per gallon (as applied, including water and exempt solvents), and 3.5 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The OC content of all coatings used for prep solvent shall not exceed 6.6 pounds per gallon (as applied, including water and exempt solvents), and 2.0 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The OC content of all coatings used for primer sealer shall not exceed 4.6 pounds per gallon (as applied, including water and exempt solvents), and 3.5 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The OC content of all coatings used for specialty coating shall not exceed 7.0 pounds per gallon (as applied, including water and exempt solvents), and 6.1 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The OC content of all coatings used for base coat shall not exceed 6.6 pounds per gallon (as applied, including water and exempt solvents), and 6.3 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The OC content of all coatings used for clear coat shall not exceed 4.2 pounds per gallon (as applied, including water and exempt solvents), and 4.1 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The OC content of all coatings used for wash thinner shall not exceed 7.5 pounds per gallon (as applied, including water and exempt solvents), and 7.3 pounds per gallon (as applied, including water and exempt solvents) as a monthly, volume-weighted average.

The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation basis.

B. Operational Restrictions

1. The permittee shall store all waste material in closed containers.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each calendar quarter:
 - a. The amount of solvent and coating waste material from emissions unit K001 disposed of during the calendar quarter (January through March, April through June, July through September and October through December), in pounds.
 - b. The solids content of the waste material disposed of, in percent by weight.
 - c. The OC content of the waste material disposed of, in percent by weight.
 - d. The total amount of OC disposed of during the quarter [(a)*(c)].

If for any calendar quarter, the permittee does not wish to take credit for organic compounds disposed of as waste, when determining the rolling, 12-month summation of OC emissions, the permittee is not required to maintain the records required in Terms C.1.a through C.1.d for that particular quarter, but shall maintain a record that it did not wish to take this credit for that particular quarter.

2. The permittee shall collect and record the following information for each calendar month:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon (as applied, including water and exempt solvents).
 - c. The classification of each coating and cleanup material employed (i.e., metal pre-treatment/etch primer, primer surfacer, prep solvent, primer sealer, specialty coating, base coat, clear coat, or wash thinner).
 - d. The amount of each coating and cleanup material employed, in gallons (as applied, including water and exempt solvents).
 - e. The monthly OC emission rate determined by taking the sum of the OC content from (b) times the usage rate from (d) for each coating and cleanup material employed.
 - f. The monthly, volume-weighted average OC content of all coatings and cleanup materials (as applied, including water and exempt solvents), employed for each classification (i.e., metal pre-treatment/etch primer, primer surfacer, prep solvent, primer sealer, specialty coating, base coat, clear coat, or wash thinner), in pounds per gallon.
 - g. For the first 12 calendar months of operation, the total cumulative monthly OC emissions calculated by adding the monthly emissions for each month of operation and subtracting the amount of OC disposed of in waste material for each completed calendar quarter.
 - h. After the first 12 calendar months of operation, the rolling, 12-month summation of the OC emissions calculated by adding the monthly emissions for the current month and the preceding eleven calendar months and subtracting the amount of OC disposed of in waste material for each complete calendar quarter within the rolling, 12-month period. If a part of any calendar quarter lies outside of the rolling, 12-month summation, the permittee shall not subtract the amount of OC disposed of in waste for that calendar quarter.
3. The permittee shall collect and record the following information each month for all HAPs-containing materials employed in the entire facility:
 - a. The name and identification number of each material, as applied.
 - b. The individual hazardous air pollutant (HAP) content for each HAP of each such material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each such material, in pounds of combined HAPs per gallon, as applied (sum all the individual HAP contents from (b)).
 - d. The number of gallons of each such material employed.

- e. The total individual HAP emissions for each HAP from such materials, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each such material and dividing by 2,000 lbs/ton if the units are in tons).
- f. The total combined HAP emissions from such materials, in pounds or tons per month (the sum of (c) times (d) for each such material and divided by 2,000 lbs/ton if the units are in tons).
- g. The cumulative monthly total for the first 12 months of operation and the updated rolling, 12-month summation thereafter of the total individual HAP emissions for each HAP, in pounds or tons.
- h. The cumulative monthly total for the first 12 months of operation and the updated rolling, 12-month summation thereafter of the total combined HAP emissions, 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 District Office or local air agency contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

- 1. The permittee shall submit quarterly reports that contain the following information:
 - a. The total OC emissions for each calendar month in the reporting period.
 - b. After 12 calendar months of operation, the updated rolling, 12-month summation of the OC emissions for each calendar month in the reporting period shall also be included in the report.

The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters.

In addition, the report due on January 30 shall include the total OC emissions from the emissions unit for the previous calendar year.
- 2. The permittee shall notify the Director of any monthly record showing that this emissions unit exceeded any OC content limitation and/or any monthly, volume-weighted average OC content limitation, as specified for this emissions unit and each material classification.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record showing that the calculated single HAP emissions or combination of HAPs emissions exceeded the applicable limitation.

E. Testing Requirements

- 1. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings and cleanup materials.
- 2. Compliance with the OC emission and OC content limits in Term A.2 shall be determined by the record keeping performed pursuant to Terms C.1 and C.2.
- 3. Compliance with HAPs emission limits in Term A.2 shall be determined by the record keeping performed pursuant to Term C.3.
- 4. Compliance with the annual PM, PM10, NOx, SO2, and CO emission limitations is ensured since each of those limitations is based on the hourly emission limitation times 8,760 hours/year and divided by 2,000 lbs/ton.
- 5. Compliance with the visible particulate emission limitation shall be determined in accordance with the method prescribed in OAC rule 3745-17-03(B)(1).
- 6. Compliance with the hourly emission limitations shall be determined by either testing pursuant to the applicable test methods of 40 CFR, Part 60, Appendix A, or by use of the appropriate emission factor from AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition, times the maximum hourly processing rate, in the units of the emission factor.

F. Miscellaneous Requirements

- 1. If probable cause exists indicating the emissions unit is causing or contributing to a nuisance, in violation of OAC rule 3475-15-07, the permittee shall be required to submit and implement a control program that will bring this emissions unit into compliance.