

Facility ID: 1409000892 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: 1409000892 Emissions Unit ID: R001 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>
Paint spray booth no.1	OAC rule 3745-31-05 (PTI 14-4612)	0.551 lb of particulate matter (PM) 0.551 lb of PM10/hr, 2.41 TPY of PM 2.41 TPY of PM10 See section A.2. below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	Equal to or less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07(G)(2)	See section A.2.b. below.
	OAC rule 3745-21-09(U)(1)	Exempt pursuant to OAC rule 3745-21-09(U)(2)(f).

**2. Additional Terms and Conditions**

- (a) The actual emissions 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 based upon a rolling, 12-month summation.  
The organic compound (OC) emissions from coatings and organic cleanup material employed for non-metal parts shall not exceed 8 lbs/hr and 40 lbs/day.  
The OC emissions from coatings and organic cleanup material employed for metal parts shall not exceed 56.1 lbs/day.  
The total OC emissions from coatings and organic cleanup material employed for both metal and non-metal parts shall not exceed 4.5 TPY.

**B. Operational Restrictions**

1. The permittee shall use high volume low pressure (HVLV) paint spray guns in this emissions unit.

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

1. The permittee shall collect and record the following information each month for the entire facility:
  - for coatings:
    - a. the name and identification number of each coating, as employed;
    - 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) for each coating];
    - d. the number of gallons of each coating employed;
  - for cleanup material:
    - 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) for each cleanup material];

h. the number of gallons of each cleanup material employed;

for total HAP emissions:

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in 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 2000 lbs/ton];

j. the total combined HAP emissions from all coatings and cleanup materials employed, in 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 2000 lbs/ton];

k. the updated rolling, 12-month summation for individual HAP emissions for each HAP, 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 for total combined HAP emissions, in 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 the Hamilton County Department of Environmental Services. This information does not have to be kept on a line-by-line basis.

2. The permittee shall maintain the following daily records for all coatings and organic cleanup material employed for coating non-metal parts in each of the emissions units R001, R002 and R003 (these records shall be maintained separately for each of these emissions units):

a. the name and company identification for each coating and organic cleanup material employed;

b. documentation on whether or not each coating and organic cleanup material is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5);

c. the number of gallons of each coating and organic cleanup material employed;

d. the OC content of each coating and organic cleanup material, in pounds per gallon, as applied, including water and exempt solvents;

e. the total OC emission rate for all coatings and organic cleanup materials employed, in pounds per day (summation of c x d for each coating and cleanup material);

f. the number of hours the emissions unit was in operation; and

g. the average hourly total OC emission rate for all coatings and organic cleanup materials employed, in pounds per hour, calculated by dividing (e) by (f).

3. The permittee shall maintain the following daily records for all coatings and organic cleanup material employed for coating metal parts in emissions unit R001, R002 and R003 (these records shall be maintained separately for each of these emissions units):

a. the name and company identification for each coating and organic cleanup material employed;

b. the number of gallons of each coating and organic cleanup material employed;

c. the OC content of each coating and organic cleanup material, in pounds per gallon, as applied, including water and exempt solvents; and

d. the total OC emission rate for all coatings and organic cleanup materials employed, in pounds per day (summation of b x c for each coating and cleanup material).

4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations set forth in this permit. The permittee shall submit 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 of each year. If no exceedances occurred during the reporting period, then a report is required stating so.

2. The permittee shall submit deviation (excursion) reports which include the following information for each of emissions units R001, R002 and R003:

a. An identification of each day during which non-metal parts were coated and the OC emissions from the coatings and organic cleanup materials for non-metal parts exceeded 40 lbs/day, and the actual OC emissions for each such day.

- b. An identification of each day during which non-metal parts were coated and the average OC emissions from the coatings and organic cleanup materials for non-metal parts exceeded 8 lbs/hr, and the average OC emissions for each such day.
  - c. An identification of each day during which metal parts were coated and the OC emissions from the coatings and organic cleanup materials for metal parts exceeded 56.1 lbs/day, and the actual OC emissions for each such day.
3. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize the monthly OC emissions for each of emissions units R001, R002 and R003, in tons.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

**E. Testing Requirements**

- 1. Formulation data or USEPA method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
- 2. Compliance with the OC emission limitations in Sections A.2.b., A.2.c. and A.2.d. shall be determined by the record keeping performed in accordance with sections C.2. and C.3.
- 3. Compliance with the HAPs emissions limitations in Section A.2.a. shall be determined by the record keeping performed in accordance with section C.1.

- 4. Emission Limitation:  
20% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance with this emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix A" of 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996).

- 5. Emission Limitation:  
0.551 lb/hour PM and PM10

Applicable Compliance Method:

Compliance with the particulate emission limit shall be determined in accordance with the following method or, if required, by stack testing using the method specified in OAC rule 3745-17-03(B)(10):

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$

Where:

E = particulate matter emissions rate (lbs/hr),

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, and

CE = fractional control efficiency of the control equipment.

**F. Miscellaneous Requirements**

- 1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology (BAT) requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene  
 TLV (ug/m3): 188.00  
 Maximum Hourly Emission Rate (lbs/hr): 24.00  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 796.4  
 MAGLC (ug/m3): 4476.19

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.