Facility ID: 1409000892 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: 1409000892 Emissions Unit ID: R004 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - Laminating Area	OAC rule 3745-31-05(A)(3) (PTI 14-4612)	Particulate Emissions (PE) shall not exceed 0.551 lb/hr and 2.41 TPY. Particulate Matter 10 microns and less (PM10) emissions shall not exceed 0.551 lb/hr and 2.41 TPY Organic Compound emissions (OC) shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 TPY See Section F.1. The requirements of this rule also include compliance with OAC rules 3745-17-07(A), 3745-17-11(B)(1) and 3745-21-07(G)(2).
	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)	The emission limit specified by this rule is equally stringent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The emission limit specified by this rule is equally stringent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

   (a) The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from R001 (Paint Spray Booth No. 1), R002 (Paint Spray Booth No. 2), R003 (Paint Spray Booth No. 3) and R004 (Paint Spray Booth No. 4) shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

   * This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:

   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 number 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 [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
k. the updated rolling, 12-month summation of usage for each individual 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 of usage for the total combined HAPs**, 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 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 amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall maintain the following daily records for emissions unit R004:

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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4612. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compounds emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr):
= 8 lbs/hr from R001 + 8 lbs/hr from R002 + 8 lbs/hr from R003 + 8 lbs/hr from R004
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2095.4
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methylene chloride

TLV (ug/m3): 174,000
Maximum Hourly Emission Rate (lbs/hr): = 8 lbs/hr from R004
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1299
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4143

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4612 and the operating permit:
a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.

c. Any change to the emissions unit or its method of operation that would either 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.

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 emissions unit R004:

   a. An identification of each day during which the OC emissions from the coatings and organic cleanup material exceeded 40 pounds per day, and the actual OC emissions for each such day.

   b. An identification of each day during which the average OC emissions from the coatings and organic cleanup material exceeded 8 pounds per hour, and the average 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 following information for emissions unit R004:

   The monthly OC emissions for each month in the reporting period, 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 term and condition A.1. shall be determined by the record keeping performed in accordance with Section C.2.

3. Compliance with the HAPs emissions limitations in term and condition A.2.a. shall be determined by the record keeping performed in accordance with Section C.1.

4. 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 = maximum coating solids usage rate (in pounds per hour) X (1-TE) X (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.

5. 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).

F. **Miscellaneous Requirements**

1. Per OAC rule 3745-17-11(C)(3), the requirements of OAC rule 3745-17-11(C)(1) and (C)(2) do not apply since a best available technology limit for particulate emissions was established in a permit to install issued after January 1, 1990.