

Facility ID: 1409010844 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: 1409010844 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>
40 hp coating disperser	OAC rule 3745-31-05(A)(3) (PTI 14-3942)	4.03 lbs of particulate emissions (PE)/hr 20.16 lbs of PE/day 1.5 tons per year (TPY) of PE;
		3.43 lbs of particulate matter emissions with a diameter of 10 microns or less (PM10)/hr 17.14 lbs of PM10 emissions/day 1.3 TPY of PM10 emissions;
		8 lbs of organic compound (OC) emissions/hr 40 lbs of OC emissions/day, including cleanup material 3.8 TPY of OC emissions, including cleanup material
	OAC rule 3745-17-07(A)(1)	See Sections A.2.a and A.2.c below. The visible PE limitation specified by this rule is the same as the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	See Section A.2.a below. The PE limitation specified by this rule is less stringent than the PE limitation established by OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The hourly and daily OC emission limitations specified by this rule are less stringent than the hourly and daily OC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
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 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
The OC content of each cleanup material employed in this emissions unit shall not exceed 7.25 pounds per gallon, as applied.

B. Operational Restrictions

1. The amount of organic solvents, excluding organic solvents in cleanup material, used in this emissions unit shall not exceed 1,067 pounds per hour, 3,400 pounds per day, and 200 tons per year.
2. The amount of pigments used in this emissions unit shall not exceed 806 pounds per hour, 4,031 pounds per day, and 300 tons per year.

3. The amount of cleanup materials lost while cleaning this emissions unit (equal to the amount of solvent used for cleanup minus the amount of solvent collected to be used again) shall not exceed 2 gallons per day and 625 gallons per year.
 4. The total combined amount of chrome oxides used in emissions units P001, P002 and P003 shall not exceed 12.7 pounds per hour.
 5. The emissions unit shall be equipped with a tight-fitting cover at all times except during loading and unloading.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each organic solvent, excluding organic solvents in cleanup materials, employed;
 - b. the individual HAP content for each HAP of each organic solvent, excluding organic solvents in cleanup materials, in pounds of individual HAP per pound of solvent, as employed;
 - c. the total combined HAP content of each organic solvent, excluding organic solvents in cleanup materials, in pounds of combined HAPs per pound of organic solvent, as employed [sum all the individual HAP contents from (b)];
 - d. the number of pounds of each organic solvent, excluding organic solvents in cleanup materials, 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.e., the amount of cleanup materials used, minus the amount of cleanup materials collected for reuse, as calculated in Section C.2.h];
 - i. the total individual HAP usage for each HAP from all organic solvents and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each organic solvent, times 0.015 (1.5% emission factor, from AP-42, Chapter 6.4.1) for each organic solvent, 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 usage from all organic solvents and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each organic solvent, times 0.015 (1.5% emission factor, from AP-42, Chapter 6.4.1) for each organic solvent, 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 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 tons. This shall include the information for the current month and the preceding eleven calendar months.

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

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 field office or local air agency contact. This information does not have to be kept on a line-by-line basis.
 2. This facility shall maintain daily records of the following information for this emissions unit:
 - a. the total amount of organic solvents employed, in pounds;
 - b. the total amount of pigments employed, in pounds;
 - c. the total amount of chrome oxides employed, in pounds;
 - d. the total hours of operation;
 - e. the OC content of each cleanup material employed, in lbs per gallon;
 - f. the total amount of cleanup materials employed, in gallons;
 - g. the total amount of cleanup materials collected for reuse, in gallons;
 - h. the amount of cleanup materials lost from cleaning operations calculated in accordance with the following equation:

$$\text{cleanup materials lost (gallons)} = [\text{total gallons of cleanup material used}] - [\text{total gallons of cleanup material collected for reuse}];$$
 - i. the total usage of organic solvents (a)/(d); pigments (b)/(d); and chrome oxides (c)/(d), in pounds per hour (average); and
 - j. the total combined chrome oxide usage, lbs/hour, for emission units P001, P002, and P003.
 3. The permittee shall maintain monthly records of the following information:
 - a. the amount of organic solvents employed, in pounds (summation of C.2.a for each day of the calendar

month);

- b. the amount of pigments employed, in pounds (summation of C.2.b for each day of the calendar month); and
- c. the amount of cleanup materials lost, in gallons (summation of C.2.h for each day of the calendar month).

4. The permittee shall maintain annual records of the following information for this emissions unit:

- a. the total amount of organic solvents employed, in tons (summation of C.3.a for each month of the calendar year and divided by 2,000 lbs/ton);
- b. the total amount of pigments employed, in tons (summation of C.3.b for each month of the calendar year and divided by 2,000 lbs/ton); and
- c. the total amount of cleanup materials lost, in gallons (summation of C.3.c for each month of the calendar year).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an exceedance of the hourly or daily usage limitations for organic solvents, pigments, cleanup materials and chrome oxides as specified in Section B. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month HAP emission limitations of 10 tons and 25 tons for any single HAP and combination of HAPs, respectively.

All quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit an annual report that summarizes the amount of organic solvents and pigments used, in tons, and the amount of cleanup materials lost, in gallons, for the calendar year. In addition, the annual report shall also specify the total HAP emissions, in tons, for the calendar year. The annual report shall be submitted by February 15th of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the OC and PM10 emission limitations specified in Section A.1, the OC content, visible PE and HAP emission limitations specified in Section A.2, and the organic solvent usage, organic solvent lost, pigment usage and the total chrome oxide usage restrictions specified in Section B shall be determined by the following methods:

PE Limitations: 4.03 lbs of PE/hr; 20.16 lbs of PE/day; 1.5 TPY of PE

Applicable Compliance Method: Compliance with the hourly PE limitation shall be determined as follows:

Multiply the maximum pounds of pigments employed per hour by the emission factor of 20 lbs of PE per ton of pigments employed (from AP-42, Chapter 6, Table 6.4.1) and by (1 minus the fractional control efficiency (0.50) of the control device) (i.e., the control efficiency for the tight-fitting cover), and divided by 2,000 lbs/ton.

Compliance with the daily PE limitation shall be determined as follows:

Multiply the maximum pounds of pigments used per day by the emission factor of 20 lbs of PE per ton of pigments employed (from AP-42, Chapter 6, Table 6.4.1) and by (1 minus the fractional control efficiency (0.50) of the control device) (i.e., the control efficiency for the tight-fitting cover), and divided by 2,000 lbs/ton.

Compliance with the annual PE limitation shall be determined as follows:

Multiply the maximum tons of pigments used per year by the emission factor of 20 lbs of PE per ton of pigments employed (from AP-42, Chapter 6, Table 6.4.1) and by (1 minus the fractional control efficiency (0.50) of the control device) (i.e., the control efficiency for the tight-fitting cover), and divided by 2,000 lbs/ton.

In addition, compliance with the hourly, daily and annual PE limitations are ensured if compliance is maintained with the hourly, daily and annual pigment usage restrictions.

PM10 Emission Limitations: 3.43 lbs of PM10 emissions/hr; 17.14 lbs of PM10 emissions/day; 1.3 TPY of PM10 emissions

Applicable Compliance Method: Compliance with the hourly PM10 emission limitation shall be determined as follows:

Multiply the maximum lbs of PE/hr by 0.85 (the PM10 fraction, Reference: AP-42, 4th Edition, Table C.2-2, Category 4, Page C.2-11)

Compliance with the daily PM10 emission limitation shall be determined as follows:

Multiply the maximum lbs of PE/day by 0.85 (the PM10 fraction, Reference: AP-42, 4th Edition, Table C.2-2, Category 4, Page C.2-11)

Compliance with the annual PM10 emission limitation shall be determined as follows:

Multiply the lbs of PE/year by 0.85 (the PM10 fraction, Reference: AP-42, 4th Edition, Table C.2-2, Category 4, Page C.2-11)

In addition, compliance with the hourly, daily and annual PM10 emission limitations are ensured if compliance is maintained with the hourly, daily and annual PE limitations.

OC Emission Limitations: 8 lbs of OC emissions/hr; 40 lbs of OC emissions/day; 3.8 TPY of OC emissions

Applicable Compliance Method: Compliance with the hourly OC emission limitation shall be determined as

follows:

Multiply the maximum pounds of organic solvents used per hour by the emission factor of 30 lbs of OC emissions per ton of organic solvents employed (from AP-42, Chapter 6, Table 6.4.1) and by (1 minus the fraction control efficiency (0.50) of the control device (i.e., the control efficiency for the tight-fitting cover), and divided by 2,000 lbs/ton.

Compliance with the daily OC emission limitation shall be determined as follows:

Multiply the maximum pounds of organic solvents used per day by the emission factor of 30 lbs of OC emissions per ton of organic solvents employed (from AP-42, Chapter 6, Table 6.4.1) and by (1 minus the fractional control efficiency (0.50) of the control device) (i.e., the control efficiency for the tight-fitting cover) and divided by 2,000 lbs/ton, plus the amount, in gallons, of cleanup material employed per day multiplied by the OC content, in lbs/gallon, of the cleanup material.

Compliance with the annual OC emission limitation shall be determined as follows:

Multiply the tons of organic solvents used per year by the emission factor of 30 lbs of OC emissions per ton of organic solvents employed (from AP-42, Chapter 6, Table 6.4.1) and by (1 minus the fractional control efficiency (0.50) of the control device) (i.e., the control efficiency for the tight-fitting cover) and divided by 2,000 lbs/ton, plus the amount, in gallons, of cleanup materials employed per year and multiplied by the OC content of the cleanup materials.

In addition, compliance with the hourly, daily and annual OC emission limitations are ensured if compliance is maintained with the hourly, daily and annual organic solvent usage restrictions and the daily and annual cleanup material usage restrictions.

OC Content Limitation: 7.25 lbs/gallon for cleanup materials

Applicable Compliance Method: Compliance with the OC content limitation for cleanup materials shall be determined by the record keeping specified in Section C.2. Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of any cleanup material.

Visible PE Limitation: Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method: Compliance with the visible PE limitation shall be determined by the method specified in 40 CFR, Part 60, Appendix A, Test Method 9 pursuant to OAC rule 3745-17-03(B)(1).

HAP Emission Limitations: not to exceed 10 TPY for any single HAP and 25 TPY for any combination of HAPs

Applicable Compliance Method: Compliance with the HAP emission limitation shall be determined by the record keeping specified in Section C.1.

Organic Solvent Usage Restrictions: 11,067 lbs/hr; 3,400 lbs/day; 200 TPY

Applicable Compliance Method: Compliance with the hourly and daily organic solvent usage restriction shall be determined by the record keeping specified in Section C.2. Compliance with the annual organic solvent usage restriction shall be determined by the record keeping specified in Section C.4.

Pigment Usage Restrictions: 806 lbs/hr; 4,031 lbs/day; 300 TPY

Applicable Compliance Method: Compliance with the hourly and daily pigment usage restrictions shall be determined by the record keeping specified in Section C.2. Compliance with the annual pigment usage restriction shall be determined by the record keeping specified in Section C.4.

Cleanup Material Lost Restrictions: 2 gallons/day; 625 gallons/year

Applicable Compliance Method: Compliance with the daily and annual cleanup material lost restrictions shall be determined by the record keeping specified in Sections C.2 and C.4, respectively.

Chrome Oxide Usage Restriction: total combined chrome oxide usage for emissions units P001, P002 and P003 shall not exceed 12.7 pounds per hour

Applicable Compliance Method: Compliance with the chrome oxide usage restriction shall be determined by the record keeping specified in Section C.2.

F. Miscellaneous Requirements

1. None