

Facility ID: 1409010995 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: 1409010995 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>
K001 - Miscellaneous metal parts painting	OAC rule 3745-31-05(A)(3) (PT114-05874)	Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 42.0 pounds/day (coatings only) and 8.43 TPY (coatings and clean-up.) See Sections A.2.a and A.2.b below. The requirements of this rule shall include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c). See Section A.2.c below.

2. **Additional Terms and Conditions**
 - (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating VOC content limitation and the mass emission limitations. The daily emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no emission records or reports are required to demonstrate compliance with these limitations. The VOC content of each coating employed shall not exceed 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents.

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 coating line:
 - a. the name and identification number of each coating employed;
 - b. the VOC content (excluding water and exempt solvents) of each coating, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - d. the monthly VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed].
2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material employed, in pounds per gallon;
 - d. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) times (c) for each cleanup material employed];
 - e. the amount of cleanup material recovered, in pounds; and

f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].

3. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating materials for the calendar year in Section C.1 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section C.2].

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing a coating VOC content greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. 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 annual compliance reports that include:
 - a. a list of all allowable emission limitations in Sections A.1 and A.2; and
 - b. a statement whether the emission unit is in compliance with the requirements listed.

The report shall be submitted to the Hamilton County Department of Environmental Services by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 42.0 pounds/day (coatings only) and 8.43 TPY (coatings and clean-up.)

Applicable Compliance Method:

Compliance with the daily VOC emission limitation shall be demonstrated by multiplying the maximum daily coating usage of 12 gallons per day, excluding water and exempt solvents, by the coating VOC content of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents. Compliance with the annual emission limitation shall be based upon the record keeping specified in Section C.3.

Emission Limitation:

The VOC content of each coating employed shall not exceed 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year