

Facility ID: 1409030600 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: 1409030600 Emissions Unit ID: K002 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>
Small Parts Paint Booth - modification	OAC rule 3745-31-05(A)(3) PTI 14-05326 modified	Volatile Organic Compound (VOC) emissions shall not exceed 38.8 lbs/day and 4.89 TPY. See terms and conditions A.2.a, A.2.b, B.1 and B.2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Exempt per OAC rule 3745-21-09(U)(2)(c) See term and condition A.2.c.
	OAC rule 3745-21-09(U)(1) OAC rule 3745-31-05(C)	

2. Additional Terms and Conditions

- (a) The VOC content of any coating employed in this emissions unit shall not exceed 3.93 pounds of VOC per gallon, as applied.
The VOC content of any cleanup material employed in this emissions unit shall not exceed 7.4 pounds of VOC per gallon, as applied.
The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions unit K001 (Military Vehicle Paint Booth), K002 (Small Parts Paint Booth), K005(Parts and Touch-up Booth), K007 (Paint Spray Booth), K008 (Paint Spray Booth), and K009 (Paint Spray Booth) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the coating and cleanup material usage limitations, the VOC content limitations and the emissions limitations.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 8 gallons per day and 2016 gallons per year.
2. The maximum cleanup material usage for this emissions unit shall not exceed 1 gallon per day and 252 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. This facility shall maintain daily records for emissions unit K002 which list the following information for each coating and cleanup material employed in this emissions unit:
 - a. The name and identification of each coating and cleanup material;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The volatile organic compound (VOC) content of each coating and cleanup material, in pounds per gallon, as applied; and
 - d. The VOC emissions from each coating and cleanup material employed, i.e., (b)x(c), in pounds;

- e. The total VOC emissions from this emissions unit, i.e., the sum of (d) for all coatings and cleanup materials employed, in pounds; and
- f. The total gallons of all coatings and cleanup materials employed.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K005, K007, K008 and K009:
- a. The name and identification number of each coating, 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)];
- d. The number of gallons of each coating 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. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or 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];
- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
- k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or 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 emissions for total combined HAP, in pounds or 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.

3. The permittee shall maintain monthly records of the coating and cleanup material usage for each month for emissions unit K002.
4. The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant 1: Butyl Acetate
 TLV (ug/m3): 712,600
 Maximum Hourly Emission Rate (lbs/hr): 6.84
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 245.4
 MAGLC (ug/m3): 16,967

Pollutant 2: Methyl Isoamyl Ketone
 TLV (ug/m3): 233,500
 Maximum Hourly Emission Rate (lbs/hr): 41.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1471
 MAGLC (ug/m3): 5560

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- 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 previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will

not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, 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 submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.c.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of the coating and cleanup material usage limit, the daily VOC emission limit, or the VOC content limit. A copy of such record shall be sent to the Director within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions and the total coating and cleanup material usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Emissions Limitations:

38.8 lbs VOC/day
4.89 TPY VOC

Applicable Compliance Method:

Compliance with the emissions limitations cited in term and condition A.1 shall be demonstrated by the record keeping required in term and condition C.1.

2. Compliance with the VOC content limits cited in terms and conditions A.2.a. and A.2.b shall be demonstrated by the record keeping in term and condition C.1.

USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

3. Compliance with the HAP emissions limits cited in term and condition A.2.c shall be demonstrated by the record keeping in term and condition C.2.
4. Compliance with the usage limits cited in terms and conditions B.1 and B.2 shall be demonstrated by the record keeping in terms and conditions C.1 and C.3.

F. Miscellaneous Requirements

1. None