

Facility ID: 1409030761 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: 1409030761 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>
K002 - DeVilbiss System 2000 Paint Spray Booth	OAC rule 3745-31-05(A)(3) (PTI #14-05612)	Volatile Organic Compound (VOC) emissions shall not exceed 7.0 pounds per hour*, excluding cleanup and 2.7 tons per year, including cleanup.
		See terms A.2.a, A.2.b, B.1, and B.2.
		*The hourly emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
	OAC rule 3745-21-09(U)(2)(c)	Exempt

2. **Additional Terms and Conditions**
 - (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of coating, as applied.
The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations, and the emission limitations.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 550 gallons.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 230 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month:
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The volume, in gallons, of each coating and cleanup material employed.
 - c. The total volume, in gallons, of all coatings and cleanup materials employed.
 - d. The VOC content of each coating and cleanup material, in pounds per gallon, as applied.
 - e. The total VOC emission rate for all coatings and cleanup materials employed, in pounds per month (b x d).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that emission unit K002 employed coatings and/or cleanup materials that exceeded the applicable maximum VOC content limits outlined in T&Cs A.2.a. and A.2.b. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the end of the month in which the exceedance(s) occurred. For each VOC content limit exceedance the permittee shall also identify if an exceedance of the applicable VOC emissions limit occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record

showing that emission unit K002 employed coatings and/or cleanup materials that exceeded the applicable maximum coating and/or cleanup materials usage limits outlined in T&Cs B.1 and B.2. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the end of the month in which the exceedance(s) occurred. For each usage limit exceedance, the permittee shall also identify if an exceedance of the applicable VOC emissions limits occurred.

E. Testing Requirements

1. Compliance with the emission limitations and VOC content limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
7.0 lbs/hr of VOC, excluding cleanup.

Applicable Compliance Method:
The hourly emission limitation specified above is based on the emissions unit's potential to emit. Compliance may be demonstrated by multiplying the maximum VOC content limit for coatings identified in term A.2.a, 7.0 lbs/gal, by the maximum coating application rate, 1.0 gal/hr.
 - b. Emission Limitation:
2.7 TPY of VOC, including cleanup.

Applicable Compliance Method:
Compliance with the above emission limitation may be demonstrated by summing the VOC emissions in lbs/month required pursuant to Section C.1.e and then dividing this number by 2000 lb/ton.
 - c. Emission Limitations:
7.0 pounds of VOC per gallon of coating, as applied.
7.0 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:
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.
2. Compliance with the coating and cleanup material usage limitations in Section B of these terms and conditions shall be determined by the record keeping requirements as specified in term C.1.

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.