Facility ID: 1409030922 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: 1409030922 Emissions Unit ID: K003 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
K003 --paint spray booth	OAC rule 3745-31-05 (A)(3) (PTI 14-05383)	The Volatile Organic Compound (VOC) emissions from coatings shall not exceed 168.0 lbs/day. The VOC emissions from coatings shall not exceed shall not exceed 11.5 tons per year (TPY). The VOC emissions from clean-up shall not exceed 204.4 lbs per month. The VOC emissions from clean-up shall not exceed 1.24 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09 (U)(1)(c	See A.2.d. below.

2. **Additional Terms and Conditions**

   (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings, coating and cleanup material usage limits.
   The VOC content of all cleanup materials shall not exceed 7.3 pounds per gallon.
   The daily emission limitation outlined above is based upon the emissions unit's potential to emit (the maximum hourly emission rate multiplied by 24 hours/day). Therefore, no daily records are required to demonstrate compliance with this limit.
   The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

B. **Operational Restrictions**

1. The maximum cleanup material usage for this emissions unit shall not exceed 28 gallons per month and 340 gallons per year.

2. The maximum annual coating usage for this emissions unit shall not exceed 6571 gallons per year, excluding water and exempt solvents.

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

1. The permittee shall collect and record the following information each month for this emissions unit:

   a. The name and identification number of each coating employed.

   b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied.

   c. The name and identification of each cleanup material employed.

   d. The VOC content of each cleanup material, in pounds per gallon.

   e. The number of gallons (excluding water and exempt solvents) of each coating employed.

f. The number of gallons of each cleanup material employed.

g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [(b x e) + (d x f)].

2. The permittee shall collect and record the following information on a daily basis for the purpose of determining the daily volume weighted average VOC content for all coatings employed in this emissions unit:

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating employed.

d. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

e. The total VOC emissions from all coatings employed in pounds per day (b x c).

3. The permit to install for this emissions unit K003 was evaluated based on the actual 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. 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: Furfuryl alcohol
TLV (ug/m3): 40,123
Maximum Hourly Emission Rate (lbs/hr): 1.11
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 63.36
MAGLC (ug/m3): 955
Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");

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) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where 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 notify the Hamilton County Department of Environmental Services in writing of any daily and/or monthly record showing the use of noncomplying coatings or cleanup materials or an exceedance of the monthly cleanup material usage limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit annual reports which identify any exceedance of the annual coating and/or cleanup material usage limitation, as well as corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitation in term A.1. of these terms and conditions shall be determined in accordance with the following method(s):

   Emission Limitation:

   3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.
   Applicable Compliance Method:

   Compliance shall be based upon the record keeping requirements specified in term C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to 40 CFR Part 60, Appendix A, 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.

2. Emission Limitation:

   168 lbs VOC/day (coatings only), 11.5 tons VOC/year(total).

   Applicable Compliance Method:

   Compliance with the above emissions limitations shall be determined by using the following equations:

   lbs VOC/day = (A x B)

   tons VOC/year = (D x B x 0.0005) + (E x C x 0.0005)

   where:

   A = daily coating usage, gallons, excluding water and exempt solvents

   B = VOC content of coatings, in pounds per gallon, excluding water and exempt solvents

   C = VOC content of cleanup material, pounds per gallon

   D = annual coating usage, gallons, excluding water and exempt solvents

   E = annual cleanup material usage, gallons

3. Compliance with the usage limits in term B.1 and B.2 shall be demonstrated by the record keeping in term C.1.

4. Compliance with the VOC content limit in term A.2.b shall be demonstrated by the record keeping in term C.1.

F. **Miscellaneous Requirements**

1. None