

Facility ID: 1409030966 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: 1409030966 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 14-05549)	Volatile Organic Compound (VOC) emissions shall not exceed 8.0 pounds per hour*, excluding cleanup and 10.8 TPY, including cleanup.  See terms A.2.a and A.2.b. See sections B.1and 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)(1) OAC rule 3745-17-11(C)	Exempt, per OAC rule 3745-21-09(U)(2)(c). See term A.2.d. See sections C.3, C.4, C.5.

**2. Additional Terms and Conditions**

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 8.0 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 8.4 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 emissions limitations.  
 The permittee shall operate the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 2200 gallons.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 475 gallons.
3. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
4. The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

5. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

1. The permittee shall collect and record the following information 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).
2. 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: xylene  
 TLV (ug/m3): 434,000  
 Maximum Hourly Emission Rate (lbs/hr): 6.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697  
 MAGLC (ug/m3): 10333

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 with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 notify the Hamilton County Department of Environmental Services in writing of any record showing that emissions 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 submit annual reports which summarize the following for this emissions unit:
  - a. The total VOC emissions from coatings and cleanup materials employed in this emissions unit for the previous calendar year.
  - b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
  - c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year to the Hamilton County Department of Environmental Services.

**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:

Emission Limitation:

VOC emissions shall not exceed 8.0 lbs/hr , 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 of 8.0 lbs/gal by the maximum coating application rate of 1.0 gal/hr.

Emission Limitation:

VOC emissions shall not exceed 10.8 TPY, 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 for the year and then dividing this number by 2000 lb/ton.

Emission Limitations:

8.0 pounds of VOC per gallon of coating, as applied.

8.4 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 usage limitations in Section B of these terms and conditions shall be determined by the record keeping requirements as specified in section C.1.

**F. Miscellaneous Requirements**

1. None