Facility ID: 1409040665 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: 1409040665 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Paint Line, consisting of an automatic disc spray booth and manual touch-up spray booth	OAC rule 3745-31-05(A)(3) (PTI 14-05655)	Volatile organic compound (VOC) emissions shall not exceed 3.33 pounds per hour*, excluding cleanup. VOC emissions shall not exceed 14.7 tons per year (TPY), including cleanup. See terms and conditions A.2.b., A.2.c., B.1. and B.2. *The hourly emission limitation outlined above is based on the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit. 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 term and condition A.2.a.

2. **Additional Terms and Conditions**

   (a) The maximum VOC content of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents.
   The maximum VOC content of each coating employed in this emissions unit shall not exceed 0.6 pound of VOC per gallon, as applied, including water and exempt solvents.
   The maximum VOC content of each cleanup material employed in this emissions unit shall not exceed 6.62 pounds of VOC per gallon, as applied.
   Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limits, coating and cleanup material usage limits and the emissions limitations.

B. **Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 48,618 gallons per year, including water and exempt solvents.

2. The maximum annual cleanup material usage for this emissions unit shall not exceed 36 gallons per year.

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 and cleanup material;

   b. the volume, in gallons, of each coating employed (including water and exempt solvents);

   c. the total volume, in gallons, of all of the coatings employed (including water and exempt solvents);

   d. the volume, in gallons, of each cleanup material employed;

   e. the VOC content of each coating employed, in pounds VOC per gallon of coating (including water and exempt

solvents), as applied;

f. the VOC content of each coating employed, in pounds VOC per gallon of coating (excluding water and exempt solvents), as applied;

g. the VOC content of each cleanup material employed, in pounds VOC per gallon; and

h. the VOC emissions from the application of coatings and cleanup materials, in pounds VOC per month [the summation of b. multiplied by e. for the coating(s) and d. multiplied by g. for the cleanup material(s) employed in K002.]

2. The permittee shall maintain annual records of the volume, in gallons, of all coatings (including water and exempt solvents) and cleanup materials employed in this emissions unit by summarizing the monthly coating usage records and cleanup material usage records at the end of each calendar year.

3. The permittee shall maintain annual records of the total VOC emissions, in tons (summation of the emissions from term C.1.h at the end of each calendar year divided by 2000 pounds per ton.)

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: 2-Butoxyethanol (CAS #111-76-2)

TLV (ug/m3): 96,662

Maximum Hourly Emission Rate (lbs/hr): 1.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 233

MAGLC (ug/m3): 2301

Physical changes to or in the method of operation of the emissions unit after it's 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 it's 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 monthly record showing that emissions unit K002 employed coatings and/or cleanup materials that exceeded the applicable maximum VOC content limits outlined in terms and conditions A.2.a., A.2.b., and A.2.c. 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 specify the annual coating and cleanup material usage and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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:

3.33 pounds per hour 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 and condition A.2.b., 0.6 pounds per gallon, by the maximum coating application rate, 5.55 gallons per hour, as provided in PTI application 14-05655 received on December 30, 2004.
b. Emission Limitation:

14.7 TPY VOC, including cleanup

Applicable Compliance Method:

Compliance with the above emissions limitation may be demonstrated by the record keeping requirements as specified in term and condition C.3.

c. Emission Limitation:

3.5 pounds of VOC per gallon for coating (excluding water/exempt solvents), as applied;
0.6 pound of VOC per gallon for coating (including water/exempt solvents), as applied; and
6.62 pounds of VOC per gallon for cleanup materials.

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 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 terms and conditions B.1. and B.2. shall be determined by the record keeping requirements as specified in term and condition C.1. and C.2.

F. **Miscellaneous Requirements**

1. None