

Facility ID: 1409040872 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: 1409040872 Emissions Unit ID: P002 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>
Pump station # 2	OAC rule 3745-31-05 (PTI 14-4505)	75 lbs/day of organic compound (OC) 9 TPY of OC See section A.2.a. below.
	OAC rule 3745-21-07(G)	The emission limitation established by this rule is less stringent than that established by OAC rule 3745-31-05 (BAT). See section B.2. below.

2. **Additional Terms and Conditions**
 - (a) The actual emissions of hazardous air pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY as a rolling, 12-month summation for any single HAP and 25 TPY as a rolling, 12-month summation for any combination of HAPs.

B. Operational Restrictions

1. The amount of liquid organic materials used shall not exceed 10,000 pounds per day, and 1,200 tons per year.
2. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each material employed.
 - b. The amount of material employed, in pounds.
 - c. The individual HAP content for each material, in weight percent.
 - d. The total combined HAP content in each material, in weight percent.
 - e. The monthly emissions of each individual HAP, in pounds, calculated as follows:

For pigments, monthly emissions (in tons) = sum of {(b x c)/2000} for each pigment containing that individual HAP.

For liquid organic material, monthly emissions (in tons) = sum of {(b x c)/2000} for each material containing that individual HAP.
 - f. The total monthly emissions of all HAPs, in tons, (sum of (e) for each HAP).
 - g. The cumulative monthly total for the first twelve months following the issuance of the permit to install for this facility and the updated rolling, 12-month summation thereafter of the individual HAP emissions for each HAP from all materials employed, in tons.
 - h. The cumulative monthly total for the first twelve months following the issuance of the permit to install for this facility and the updated rolling, 12-month summation thereafter of the combined HAP emissions for all HAPs from all materials employed, in tons.

A listing of the HAPs can be found in Section 112(b) of the CAA or can be obtained by contacting the Hamilton County Department of Environmental Services. This information does not have to be kept on an emissions unit-by-emissions unit basis.

2. The permittee shall maintain daily records which shall include the following information:

- a. The amount of organic material employed, in pounds.
 - b. The daily OC emissions, in pounds per day (the emissions shall be calculated based on an emission factor of 30 pounds of OC emissions per ton of organic material used).
 3. The permittee shall summarize the following information at the end of each calendar year:
 - a. the company identification of each liquid organic material employed in this emissions unit; and
 - b. whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
- D. Reporting Requirements**
1. The permittee shall submit annual reports which specify the total amount of liquid organic material used in this emissions unit and the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.
 2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this permit. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 30 of each year. If no exceedances occurred during the reporting period, then a report is required stating so.
 3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
 4. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services, which identify any exceedances of the daily usage and/or OC emission limits. These reports shall include copies of any daily records showing exceedances and the steps taken by the permittee to avoid such exceedances in the future. These reports shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
- E. Testing Requirements**
1. Compliance with the emissions limitations in Section A.1. and usage limitations in Section B.1. shall be determined by the record keeping performed in accordance with Section C.2.
 2. Compliance with the HAP emission limitations in Section A.2.a. shall be determined by the record keeping performed in accordance with Section C.1.
- F. Miscellaneous Requirements**
1. If probable cause exist indicating any emissions unit is causing or contributing to a nuisance in violation of OAC rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
 2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Emission units P002 & P003 combined:

Pollutant: trimethyl benzene
 TLV (ug/m3): 123
 Maximum Hourly Emission Rate (lbs/hr): 1.142
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 918.1
 MAGLC (ug/m3): 2928.57

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Hamilton County Department of Environmental Services are required, including the possible issuance of modifications to PTI number 14-4505 and this permit:

 - a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table.
 - b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
 - c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
 - d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
 - e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in

OAC rule 3745-77-01(V).