

Facility ID: 1409070344 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: 1409070344 Emissions Unit ID: P006 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>
P006- Dry Lube/Coil Coating Line w/Infrared Drying Oven	OAC rule 3745-31-05(A)(3) (PTI 14-05614)	Volatile organic compound (VOC) emissions shall not exceed 27.5 pounds per hour and 25.0 tons per year. See term A.2.a and section B.1.
	OAC rule 3745-21-09(E)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(E) and 40 CFR Part 60, Subpart TT.
	40 CFR Part 60, Subpart TT	The VOC content of the coatings shall not exceed 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents based upon a daily volume weighted average.
	ORC 3704.03(F)(4)(d)	The VOC content of the coatings shall not exceed 0.28 kilogram of VOC per liter of coating solids applied for each calendar month based upon a monthly volume weighted average. See section C.3.

2. Additional Terms and Conditions

- (a) The VOC content, as applied, of each coating employed shall not exceed 0.5 pound of VOC per gallon of coating, including water and exempt solvents. The hourly emission limitation outlined in section A.1 is based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, VOC content limitations and the coating usage limitation. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 100,000 gallons, as applied, including water and exempt solvents. This limitation shall apply only to coatings that contain volatile organic compounds.

C. Monitoring and/or Record Keeping Requirements

1. 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 (excluding water and exempt solvents) in pounds per gallon of coating for each coating employed.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted

average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day.

2. The permittee shall collect and record the following information each month for this emissions unit for the purpose of demonstrating compliance with the annual VOC emission limitation and compliance with 40 CFR Part 60, Subpart TT:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, including water and exempt solvents, as applied.
 - c. The total volume in gallons, including water and exempt solvents, of each coating employed.
 - d. The total volume in gallons, including water and exempt solvents, of all coatings employed.
 - e. The kilograms of VOC per liter of coating solids applied for each coating.
 - f. The kilograms of VOC per liter of coating solids applied based upon a monthly volume weighted average for all coatings employed.
 - g. The total VOC emissions in pounds or tons (b x c).
3. The permit to install for emissions unit P006 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: N-Ethylmorpholine
 TLV (ug/m3): 23,550
 Maximum Hourly Emission Rate (lbs/hr): 0.55
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 15
 MAGLC (ug/m3): 561

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings listed in term A.2.a. 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 to the Hamilton County Department of Environmental Services which identify any exceedances of the annual coating usage limitation in term and condition B.1, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
3. The permittee shall also submit annual reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which any coating employed in this emissions unit exceeds the 0.28 kilogram of VOC per liter of coating solids applied for each calendar month limitation. If no exceedances occurred, the permittee shall state so in the report. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the daily volume-weighted average VOC content of 2.6 pounds of VOC per gallon of coating, minus water and exempt solvents, exceeds the applicable limitation. 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 exceedance occurs.

6. Pursuant to the NSPS, the permittee is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and
 - d. The design heat input capacity of each emissions unit and the identification of the fuel to be combusted in each emissions unit (no later than 30 days after the construction date).

Reports are to be sent to:

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 27.5 pounds per hour and 25.0 tons per year.

Applicable Compliance Method:

The hourly VOC emission rate was calculated by multiplying the maximum daily coating usage rate of 55 gallons per day by the VOC content limitation of 0.5 pound of VOC per gallon coating.

The annual VOC emission rate was calculated by multiplying the maximum annual coating usage rate of 100,000 gallons per day by the VOC content limitation of 0.5 pound of VOC per gallon coating and then dividing by 2000 to convert to tons.

Compliance with the annual VOC emission limitation in term and condition A.1 shall be based upon the record keeping requirements as specified in term and condition C.2.
 - b. Emission Limitation:

The VOC content of the coatings shall not exceed 0.28 kilogram of VOC per liter of coating solids applied for each calendar month based upon a monthly volume weighted average.

Applicable Compliance Method:

Compliance shall be determined by the methods outlined in 40 CFR 60.463(c)(1) and the record keeping in term C.2.
2. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant to Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 or 24A 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 or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the VOC content limitations in term A.1 shall be determined by the record keeping requirements specified in sections C.1 and C.2.
4. Compliance with the VOC content limitation in term A.2.a shall be determined by the record keeping requirements specified in section C.1.
5. Compliance with the annual coating usage limitation in section B.1 shall be demonstrated by the record keeping in section C.2.

F. Miscellaneous Requirements

1. None