

Facility ID: 1409070634 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: 1409070634 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> |
|-----------------------------------------------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Structural Steel and Weldments Coating Booth | OAC rule 3745-31-05 (PTI 14-2012) | Emissions of volatile organic compounds (VOC) from all coatings and cleanup materials shall not exceed 10.5 lbs/hr and 9.92 tpy. |
| | OAC rule 3745-21-09(U)(1) | See A.2.a - A.2.b below. Less or equally as stringent as the BAT-based limitations of OAC rule 3745-31-05, above. |

2. **Additional Terms and Conditions**
 - (a) The daily, volume-weighted average VOC content of all coatings employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied. The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.062 pounds of VOC per gallon, as applied.

B. Operational Restrictions

1. Maximum coating usage in this emissions unit shall not exceed 3 gal/hr and 3650 gal/year.
2. Maximum cleanup material usage in this emissions unit shall not exceed 1000 gallons/year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a daily basis:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the water content and solids content of each coating employed, in percent by volume, as applied;
 - c. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied;
 - d. the volume of each coating employed, in gallons (excluding water and exempt solvents), as applied;
 - e. the daily, volume-weighted average VOC content for all coatings, as applied (i.e., the sum of the the products of VOC content [C.1.c] multiplied by coating volume [C.1.d] for each coating identified in section C.1.a, divided by total volume of all coatings employed that day);
 - f. the VOC content of each cleanup material employed, in pounds per gallon;
 - g. the volume of each cleanup material employed, in gallons;
 - h. the hours of operation;
 - i. the average hourly VOC emission rate from all coatings and cleanup materials (i.e., the sum of [(C.1.c)x (C.1.d)]+[(C.1.f)x(C.1.g)] for all coatings and cleanup materials identified in section C.1.a, divided by the daily hours of operation [C.1.h]); and
 - j. the average hourly coating usage rate (i.e., the sum of [C.1.d]/[C.1.h] for each coating identified in section C.1.a).

2. The permittee shall calculate and record the following information on an annual basis:
 - a. the total VOC emissions from all coatings and cleanup materials employed in this emissions unit, based on the records required in sections C.1.a - C.1.i of this permit; and
 - b. the total volume of all coatings (minus water and exempt solvents) and all cleanup materials employed, in gallons, based on the records required in sections C.1.a - C.1.g of this permit

D. Reporting Requirements

1. 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 limitation for all coatings has been exceeded. 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the hourly VOC emissions limitation for all coatings and cleanup materials has been exceeded. 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.
3. The permittee shall submit deviation (excursion) reports which identify any exceedance(s) of the hourly restriction on coating usage, pursuant to section B.1 of this permit. The notification shall include a copy of the record(s) documenting the exceedance. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
4. The permittee shall submit deviation (excursion) reports which identify any exceedance(s) of the VOC content limitation on cleanup materials employed in this emission unit, pursuant to section A.2.b of this permit. The notification shall include a copy of the record(s) documenting the exceedance. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual deviation (excursion) reports which identify any exceedance(s) of the annual VOC emissions limitation for all coatings and cleanup materials, pursuant to section A.1 of this permit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year, when required, and shall reflect emissions during the previous calendar year.
6. The permittee shall submit annual deviation (excursion) reports which identify any exceedance(s) of the annual restrictions on coating and cleanup material usage, pursuant to sections B.1 - B.2 of this permit. The notifications shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year, when required, and shall reflect usage during the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A of these terms and conditions shall be demonstrated in accordance with the following methods:

Emission Limitation:

10.5 lbs hr and 9.92 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1, C.2, D.2 and D.6 of this permit.

Emission Limitation:

3.5 lbs VOC/gal coating (daily volume-weighted average) and 7.062 lbs VOC/gal cleanup material

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1, D.1 and D.4 of this permit.
2. Method 24 of 40 CFR Part 60, Appendix A, shall be used to determine the VOC content for coatings. If, pursuant to section 4.3 of method 24, 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.

F. Miscellaneous Requirements

1. None