

Facility ID: 1409070663 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.

- [Go to Part II for Emissions Unit R001](#)
- [Go to Part II for Emissions Unit R002](#)
- [Go to Part II for Emissions Unit R009](#)
- [Go to Part II for Emissions Unit R010](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409070663 Emissions Unit ID: R001 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>
automated paint spray booth #1	OAC rule 3745-31-05 (PTI 14-4641)	See A.2. and B.2.
	OAC rule 3745-21-07(G)	See B.1.

2. Additional Terms and Conditions

- (a) The organic compound (OC) emissions from this emissions unit shall not exceed 35 pounds per hour*.

The above hourly OC emissions limitation is based upon the emissions unit's potential to emit and, thus, no hourly records are required to demonstrate compliance with this limit. The total combined OC emissions from emissions units R001, R002, R009 and R010 shall not exceed 35 tons per year as a rolling, 12-month summation. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of permit to install (PTI) 14-4641 (issued on September 1, 1999), the permittee shall not exceed the HAPs emissions limits specified in the following table:

Month(s)	Maximum Allowable	Maximum
	Single HAP Emissions	Combined HAP Emissions (Tons)
	(Tons)	(Tons)
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the annual HAPs emission limitations shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate. The OC content (as applied) of each coating employed in this emissions unit shall not exceed 6.42

pounds of OC per gallon of coating.

The OC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds of OC per gallon of cleanup material.

B. Operational Restrictions

1. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited in this emissions unit.
2. The combined maximum annual coating usage in emissions units R001, R002, R009 and R010 shall not exceed 10,730 gallons per year based upon a rolling, 12-month summation of the coating usages.

The combined maximum annual organic cleanup material usage in emissions units R001, R002, R009 and R010 shall not exceed 150 gallons per year based upon a rolling, 12-month summation of the cleanup material usages.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), the permittee shall not exceed the coating and organic cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Maximum Cumulative Coating Usage (Gallons)	Maximum Allowable Maximum Cumulative Cleanup Material Usage (Gallons)
1	894	12.5
1-2	1788	25
1-3	2682	37.5
1-4	3577	50
1-5	4471	62.5
1-6	5365	75
1-7	6259	87.5
1-8	7153	100
1-9	8047	112.5
1-10	8942	125
1-11	9836	137.5
1-12	10730	150

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the coating and organic cleanup material usage restriction shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for emissions units R001, R002, R009 and R010 combined:
 - a. The company identification for each coating and organic cleanup material employed.
 - b. Documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
 - c. The number of gallons of each coating employed.
 - d. The number of gallons of each organic cleanup material employed.
 - e. The OC content of each coating, in pounds per gallon.
 - f. The OC content of each organic cleanup material, in pounds per gallon.
 - g. The total monthly OC emissions from emissions units R001, R002, R009 and R010 combined [summation of (c x e)/2000 for each coating plus the summation of (d x f)/2000 for each cleanup material], in tons.
 - h. The updated rolling, 12-month summation of OC emissions, in tons.
 - i. Beginning after the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the rolling, 12-month summation of the coating and cleanup material usages.

Also, during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the permittee shall record the cumulative coating and cleanup material usages for each calendar month.
2. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating employed.
 - b. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [summation of all the individual HAP contents from (b) for each coating].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [summation of all the individual HAP contents from (f) for each cleanup material].

h. The number of gallons of each cleanup material employed.

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month [for each HAP the summation of (b x d) for each coating plus the summation of (f x h) for each cleanup material, divided by 2000].

j. The total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the summation of (c x d) for each coating plus the summation of (g x h) for each cleanup material, divided by 2000].

k. The updated rolling, 12-month summation of emissions for each individual HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.

l. The updated rolling, 12-month summation of emissions for total combined HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services' contact. This information does not have to be kept on a line-by-line basis.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. 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 the use of coatings or cleanup materials exceeding an OC content limit. 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 notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:
 - a. The total individual HAP emission limitation for each HAP for all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period.
 - b. The total combined HAP emission limitation for all HAPs for all coatings and cleanup materials employed, in tons per month and tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating and cleanup material usage restrictions and, for the first 12 calendar months of operation following the issuance of PTI 14-4641, all exceedances of the maximum allowable cumulative coating and cleanup material usage levels.
4. 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.
5. The permittee shall submit annual reports which specify the total OC emissions from emissions units R001, R002, R009 and R010 for the previous calendar year. These reports shall be submitted by January 30 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.2. and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation -
35 lbs of OC/hr

Applicable Compliance Method -
Compliance with the above hourly emission limitation shall be determined by multiplying the maximum hourly coating usage (gallons/hr) by the maximum OC content of all the coatings used (lbs of OC/gallon of coating) plus the product of the maximum hourly cleanup material usage (gallons/hr) multiplied by the maximum OC content of all the cleanup materials used (lbs of OC/gallon of cleanup material).

Emission Limitation -
35 tons/rolling, 12-month period

Applicable Compliance Method -
Compliance with the above emission limitation shall be determined by the record keeping in section C.1. of these terms and conditions and in the permits to operate for emissions units R002, R009, and R010.
24.9 tons/rolling, 12-month period (for all HAPs combined)
9.9 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -
 Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.2. of the terms and conditions of this permit.
 Emission Limitation -
 6.42 lbs of OC/gallon of coating
 7.6 lbs of OC/gallon of cleanup material

Applicable Compliance Method -
 Compliance with the above emission limitations shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.
 Usage Restriction -
 10,730 gallons of coating per rolling, 12-month period

Applicable Compliance Method -
 Compliance with the above annual coating usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.
 Usage Restriction -
 150 gallons of cleanup material per rolling, 12-month period

Applicable Compliance Method -
 Compliance with the above annual cleanup material usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.

2. USEPA Method 24 or 24A shall be used to determine the OC content for all coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. 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 limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and 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:

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 4.41
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 2,005
 MAGLC (ug/m3): 4,476

Pollutant: Cyclohexane
 TLV (ug/m3): 1,032,600
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 8.28
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 3,724
 MAGLC (ug/m3): 24,586

Pollutant: Butanol
 TLV (ug/m3): 151,570
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 7.58
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 3,437
 MAGLC (ug/m3): 3,609

Pollutant: Methyl ethyl ketone
 TLV (ug/m3): 589,770
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 11.22
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 5,049
 MAGLC (ug/m3): 14,042

Pollutant: Butyl acetate
 TLV (ug/m3): 712,640
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 17.93
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 8,092
 MAGLC (ug/m3): 16,968

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table.

- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 1409070663 Emissions Unit ID: R002 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>
automated paint spray booth #2	OAC rule 3745-31-05 (PTI 14-4641)	See A.2. and B.2.
	OAC rule 3745-21-07(G)	See B.1.

2. Additional Terms and Conditions

- (a) The organic compound (OC) emissions from this emissions unit shall not exceed 35 pounds per hour*.

*The above hourly OC emissions limitation is based upon the emissions unit's potential to emit and, thus, no hourly records are required to demonstrate compliance with this limit.
The total combined OC emissions from emissions units R001, R002, R009 and R010 shall not exceed 35 tons per year as a rolling, 12-month summation.
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of permit to install (PTI) 14-4641 (issued on September 1, 1999), the permittee shall not exceed the HAPs emissions limits specified in the following table:

Month(s)	Maximum Allowable Single HAP Emissions (Tons)	Maximum Allowable Combined HAP Emissions (Tons)
1-2	0.8	2.1
3-12	1.7	4.2

- 1-3 2.5 6.2
- 1-4 3.3 8.3
- 1-5 4.2 10.4
- 1-6 5.0 12.5
- 1-7 5.8 14.6
- 1-8 6.7 16.7
- 1-9 7.5 18.8
- 1-10 8.3 20.8
- 1-11 9.2 22.9
- 1-12 9.9 24.9

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the annual HAPs emission limitations shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The OC content (as applied) of each coating employed in this emissions unit shall not exceed 6.42 pounds of OC per gallon of coating.

The OC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds of OC per gallon of cleanup material.

B. Operational Restrictions

1. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited in this emissions unit.
2. The combined maximum annual coating usage in emissions units R001, R002, R009 and R010 shall not exceed 10,730 gallons per year based upon a rolling, 12-month summation of the coating usages.

The combined maximum annual organic cleanup material usage in emissions units R001, R002, R009 and R010 shall not exceed 150 gallons per year based upon a rolling, 12-month summation of the cleanup material usages.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), the permittee shall not exceed the coating and organic cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable	Maximum
	Cumulative Coating	Allowable
	Usage (Gallons)	Cumulative Cleanup Material Usage (Gallons)

- 1 894 12.5
- 1-2 1788 25
- 1-3 2682 37.5
- 1-4 3577 50
- 1-5 4471 62.5
- 1-6 5365 75
- 1-7 6259 87.5
- 1-8 7153 100
- 1-9 8047 112.5
- 1-10 8942 125
- 1-11 9836 137.5
- 1-12 10730 150

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the coating and organic cleanup material usage restriction shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for emissions units R001, R002, R009 and R010 combined:
 - a. The company identification for each coating and organic cleanup material employed.
 - b. Documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
 - c. The number of gallons of each coating employed.
 - d. The number of gallons of each organic cleanup material employed.
 - e. The OC content of each coating, in pounds per gallon.
 - f. The OC content of each organic cleanup material, in pounds per gallon.
 - g. The total monthly OC emissions from emissions units R001, R002, R009 and R010 combined [summation of (c x e)/2000 for each coating plus the summation of (d x f)/2000 for each cleanup material], in tons.
 - h. The updated rolling, 12-month summation of OC emissions, in tons.
 - i. Beginning after the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the rolling, 12-month summation of the coating and cleanup material usages.

Also, during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the permittee shall record the cumulative coating and cleanup material usages for each calendar

month.

2. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating employed.
 - b. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [summation of all the individual HAP contents from (b) for each coating].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [summation of all the individual HAP contents from (f) for each cleanup material].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month [for each HAP the summation of (b x d) for each coating plus the summation of (f x h) for each cleanup material, divided by 2000].
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the summation of (c x d) for each coating plus the summation of (g x h) for each cleanup material, divided by 2000].
 - k. The updated rolling, 12-month summation of emissions for each individual HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.
 - l. The updated rolling, 12-month summation of emissions for total combined HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services' contact. This information does not have to be kept on a line-by-line basis.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. 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 the use of coatings or cleanup materials exceeding an OC content limit. 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 notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:
 - a. The total individual HAP emission limitation for each HAP for all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period.
 - b. The total combined HAP emission limitation for all HAPs for all coatings and cleanup materials employed, in tons per month and tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating and cleanup material usage restrictions and, for the first 12 calendar months of operation following the issuance of PTI 14-4641, all exceedances of the maximum allowable cumulative coating and cleanup material usage levels.
4. 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.
5. The permittee shall submit annual reports which specify the total OC emissions from emissions units R001, R002, R009 and R010 for the previous calendar year. These reports shall be submitted by January 30 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.2. and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:
 - Emission Limitation -
35 lbs of OC/hr
 - Applicable Compliance Method -
Compliance with the above hourly emission limitation shall be determined by multiplying the maximum hourly coating usage (gallons/hr) by the maximum OC content of all the coatings used (lbs of OC/gallon of coating) plus the product of the maximum hourly cleanup material usage (gallons/hr) multiplied by the maximum OC content of all the cleanup materials used (lbs of OC/gallon of cleanup material).
 - Emission Limitation -
35 tons/rolling, 12-month period
 - Applicable Compliance Method -
Compliance with the above emission limitation shall be determined by the record keeping in section C.1. of these terms and conditions and in the permits to operate for emissions units R002, R009, and R010.
24.9 tons/rolling, 12-month period (for all HAPs combined)
9.9 tons/rolling, 12-month period (for any individual HAP)
 - Applicable Compliance Method -
Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.2. of the terms and conditions of this permit.
 - Emission Limitation -
6.42 lbs of OC/gallon of coating
7.6 lbs of OC/gallon of cleanup material
 - Applicable Compliance Method -
Compliance with the above emission limitations shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.
 - Usage Restriction -
10,730 gallons of coating per rolling, 12-month period
 - Applicable Compliance Method -
Compliance with the above annual coating usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.
 - Usage Restriction -
150 gallons of cleanup material per rolling, 12-month period
 - Applicable Compliance Method -
Compliance with the above annual cleanup material usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.
2. USEPA Method 24 or 24A shall be used to determine the OC content for all coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. 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 limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and 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:
 - Pollutant: Toluene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 4.41
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,005
MAGLC (ug/m3): 4,476
 - Pollutant: Cyclohexane
TLV (ug/m3): 1,032,600
Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 8.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,724
MAGLC (ug/m3): 24,586
 - Pollutant: Butanol
TLV (ug/m3): 151,570
Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 7.58
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,437
MAGLC (ug/m3): 3,609
 - Pollutant: Methyl ethyl ketone
TLV (ug/m3): 589,770
Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 11.22

Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 5,049
 MAGLC (ug/m3): 14,042

Pollutant: Butyl acetate
 TLV (ug/m3): 712,640
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 17.93
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 8,092
 MAGLC (ug/m3): 16,968

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table.
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409070663 Emissions Unit ID: R009 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>
automated paint spray booth #3	OAC rule 3745-31-05 (PTI 14-4641)	See A.2. and B.2.
	OAC rule 3745-21-07(G)	See B.1.

2. Additional Terms and Conditions

- (a) The organic compound (OC) emissions from this emissions unit shall not exceed 35 pounds per hour*.

*The above hourly OC emissions limitation is based upon the emissions unit's potential to emit and, thus, no hourly records are required to demonstrate compliance with this limit.

The total combined OC emissions from emissions units R001, R002, R009 and R010 shall not exceed 35 tons per year as a rolling, 12-month summation.

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of permit to install (PTI) 14-4641 (issued on September 1, 1999), the permittee shall not exceed the HAPs emissions limits specified in the following table:

Month(s)	Maximum Allowable	Maximum
	Single HAP Emissions Allowable	(Tons) Combined HAP Emissions (Tons)

1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the annual HAPs emission limitations shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The OC content (as applied) of each coating employed in this emissions unit shall not exceed 6.42 pounds of OC per gallon of coating.

The OC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds of OC per gallon of cleanup material.

B. Operational Restrictions

1. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited in this emissions unit.
2. The combined maximum annual coating usage in emissions units R001, R002, R009 and R010 shall not exceed 10,730 gallons per year based upon a rolling, 12-month summation of the coating usages.

The combined maximum annual organic cleanup material usage in emissions units R001, R002, R009 and R010 shall not exceed 150 gallons per year based upon a rolling, 12-month summation of the cleanup material usages.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), the permittee shall not exceed the coating and organic cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable	Maximum
	Cumulative Coating Allowable	Usage (Gallons) Cumulative Cleanup Material Usage (Gallons)

1	894	12.5
1-2	1788	25
1-3	2682	37.5
1-4	3577	50
1-5	4471	62.5
1-6	5365	75
1-7	6259	87.5
1-8	7153	100
1-9	8047	112.5
1-10	8942	125
1-11	9836	137.5
1-12	10730	150

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the coating and organic cleanup material usage restriction shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for emissions units R001, R002, R009 and R010 combined:
 - a. The company identification for each coating and organic cleanup material employed.
 - b. Documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

- c. The number of gallons of each coating employed.
 - d. The number of gallons of each organic cleanup material employed.
 - e. The OC content of each coating, in pounds per gallon.
 - f. The OC content of each organic cleanup material, in pounds per gallon.
 - g. The total monthly OC emissions from emissions units R001, R002, R009 and R010 combined [summation of (c x e)/2000 for each coating plus the summation of (d x f)/2000 for each cleanup material], in tons.
 - h. The updated rolling, 12-month summation of OC emissions, in tons.
 - i. Beginning after the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the rolling, 12-month summation of the coating and cleanup material usages.

Also, during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the permittee shall record the cumulative coating and cleanup material usages for each calendar month.

- 2. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating employed.
 - b. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [summation of all the individual HAP contents from (b) for each coating].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [summation of all the individual HAP contents from (f) for each cleanup material].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month [for each HAP the summation of (b x d) for each coating plus the summation of (f x h) for each cleanup material, divided by 2000].
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the summation of (c x d) for each coating plus the summation of (g x h) for each cleanup material, divided by 2000].
 - k. The updated rolling, 12-month summation of emissions for each individual HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.
 - l. The updated rolling, 12-month summation of emissions for total combined HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services' contact. This information does not have to be kept on a line-by-line basis.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

- 3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. 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 the use of coatings or cleanup materials exceeding an OC content limit. 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 notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:
 - a. The total individual HAP emission limitation for each HAP for all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period.
 - b. The total combined HAP emission limitation for all HAPs for all coatings and cleanup materials employed, in

tons per month and tons per rolling 12-month period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating and cleanup material usage restrictions and, for the first 12 calendar months of operation following the issuance of PTI 14-4641, all exceedances of the maximum allowable cumulative coating and cleanup material usage levels.
4. 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.
5. The permittee shall submit annual reports which specify the total OC emissions from emissions units R001, R002, R009 and R010 for the previous calendar year. These reports shall be submitted by January 30 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.2. and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation -
35 lbs of OC/hr

Applicable Compliance Method -
Compliance with the above hourly emission limitation shall be determined by multiplying the maximum hourly coating usage (gallons/hr) by the maximum OC content of all the coatings used (lbs of OC/gallon of coating) plus the product of the maximum hourly cleanup material usage (gallons/hr) multiplied by the maximum OC content of all the cleanup materials used (lbs of OC/gallon of cleanup material).
Emission Limitation -
35 tons/rolling, 12-month period

Applicable Compliance Method -
Compliance with the above emission limitation shall be determined by the record keeping in section C.1. of these terms and conditions and in the permits to operate for emissions units R002, R009, and R010.
24.9 tons/rolling, 12-month period (for all HAPs combined)
9.9 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -
Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.2. of the terms and conditions of this permit.
Emission Limitation -
6.42 lbs of OC/gallon of coating
7.6 lbs of OC/gallon of cleanup material

Applicable Compliance Method -
Compliance with the above emission limitations shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.
Usage Restriction -
10,730 gallons of coating per rolling, 12-month period

Applicable Compliance Method -
Compliance with the above annual coating usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.
Usage Restriction -
150 gallons of cleanup material per rolling, 12-month period

Applicable Compliance Method -
Compliance with the above annual cleanup material usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.
2. USEPA Method 24 or 24A shall be used to determine the OC content for all coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. 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 limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and 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:

Pollutant: Toluene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 4.41
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,005
MAGLC (ug/m3): 4,476

Pollutant: Cyclohexane
 TLV (ug/m3): 1,032,600
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 8.28
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 3,724
 MAGLC (ug/m3): 24,586

Pollutant: Butanol
 TLV (ug/m3): 151,570
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 7.58
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 3,437
 MAGLC (ug/m3): 3,609

Pollutant: Methyl ethyl ketone
 TLV (ug/m3): 589,770
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 11.22
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 5,049
 MAGLC (ug/m3): 14,042

Pollutant: Butyl acetate
 TLV (ug/m3): 712,640
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 17.93
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 8,092
 MAGLC (ug/m3): 16,968

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table.
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409070663 Emissions Unit ID: R010 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>
automated paint spray booth #4	OAC rule 3745-31-05 (PTI 14-4641)	See A.2. and B.2.
	OAC rule 3745-21-07(G)	See B.1.

2. Additional Terms and Conditions

- (a) The organic compound (OC) emissions from this emissions unit shall not exceed 35 pounds per hour*.

The above hourly OC emissions limitation is based upon the emissions unit's potential to emit and, thus, no hourly records are required to demonstrate compliance with this limit. The total combined OC emissions from emissions units R001, R002, R009 and R010 shall not exceed 35 tons per year as a rolling, 12-month summation. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of permit to install (PTI) 14-4641 (issued on September 1, 1999), the permittee shall not exceed the HAPs emissions limits specified in the following table:

Month(s)	Maximum Allowable	Maximum
	Single HAP Emissions Allowable	(Tons) Combined HAP Emissions (Tons)
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the annual HAPs emission limitations shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate. The OC content (as applied) of each coating employed in this emissions unit shall not exceed 6.42 pounds of OC per gallon of coating. The OC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds of OC per gallon of cleanup material.

B. Operational Restrictions

1. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited in this emissions unit.
2. The combined maximum annual coating usage in emissions units R001, R002, R009 and R010 shall not exceed 10,730 gallons per year based upon a rolling, 12-month summation of the coating usages.

The combined maximum annual organic cleanup material usage in emissions units R001, R002, R009 and R010 shall not exceed 150 gallons per year based upon a rolling, 12-month summation of the cleanup material usages.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), the permittee shall not exceed the coating and organic cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable	Maximum
	Cumulative Coating Allowable	Usage (Gallons) Cumulative Cleanup Material Usage (Gallons)
1	894	12.5
1-2	1788	25
1-3	2682	37.5
1-4	3577	50
1-5	4471	62.5
1-6	5365	75
1-7	6259	87.5
1-8	7153	100
1-9	8047	112.5

1-10 8942 125
 1-11 9836 137.5
 1-12 10730 150

After the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued on September 1, 1999), compliance with the coating and organic cleanup material usage restriction shall be based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for emissions units R001, R002, R009 and R010 combined:
 - a. The company identification for each coating and organic cleanup material employed.
 - b. Documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
 - c. The number of gallons of each coating employed.
 - d. The number of gallons of each organic cleanup material employed.
 - e. The OC content of each coating, in pounds per gallon.
 - f. The OC content of each organic cleanup material, in pounds per gallon.
 - g. The total monthly OC emissions from emissions units R001, R002, R009 and R010 combined [summation of (c x e)/2000 for each coating plus the summation of (d x f)/2000 for each cleanup material], in tons.
 - h. The updated rolling, 12-month summation of OC emissions, in tons.
 - i. Beginning after the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the rolling, 12-month summation of the coating and cleanup material usages.

Also, during the first 12 calendar months of operation following the issuance of PTI 14-4641 (issued September 1, 1999), the permittee shall record the cumulative coating and cleanup material usages for each calendar month.

2. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating employed.
 - b. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [summation of all the individual HAP contents from (b) for each coating].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [summation of all the individual HAP contents from (f) for each cleanup material].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month [for each HAP the summation of (b x d) for each coating plus the summation of (f x h) for each cleanup material, divided by 2000].
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the summation of (c x d) for each coating plus the summation of (g x h) for each cleanup material, divided by 2000].
 - k. The updated rolling, 12-month summation of emissions for each individual HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.
 - l. The updated rolling, 12-month summation of emissions for total combined HAP emissions*, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of PTI 14-4641 (issued September 1, 1999), this shall be a cumulative total for all months since the issuance of the PTI.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services' contact. This information does not have to be kept on a line-by-line basis.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).

b. 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 the use of coatings or cleanup materials exceeding an OC content limit. 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 notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:
 - a. The total individual HAP emission limitation for each HAP for all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period.
 - b. The total combined HAP emission limitation for all HAPs for all coatings and cleanup materials employed, in tons per month and tons per rolling 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating and cleanup material usage restrictions and, for the first 12 calendar months of operation following the issuance of PTI 14-4641, all exceedances of the maximum allowable cumulative coating and cleanup material usage levels.
4. 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.
5. The permittee shall submit annual reports which specify the total OC emissions from emissions units R001, R002, R009 and R010 for the previous calendar year. These reports shall be submitted by January 30 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.2. and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation -
35 lbs of OC/hr

Applicable Compliance Method -
Compliance with the above hourly emission limitation shall be determined by multiplying the maximum hourly coating usage (gallons/hr) by the maximum OC content of all the coatings used (lbs of OC/gallon of coating) plus the product of the maximum hourly cleanup material usage (gallons/hr) multiplied by the maximum OC content of all the cleanup materials used (lbs of OC/gallon of cleanup material).

Emission Limitation -
35 tons/rolling, 12-month period

Applicable Compliance Method -
Compliance with the above emission limitation shall be determined by the record keeping in section C.1. of these terms and conditions and in the permits to operate for emissions units R002, R009, and R010.
24.9 tons/rolling, 12-month period (for all HAPs combined)
9.9 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -
Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.2. of the terms and conditions of this permit.

Emission Limitation -
6.42 lbs of OC/gallon of coating
7.6 lbs of OC/gallon of cleanup material

Applicable Compliance Method -
Compliance with the above emission limitations shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.

Usage Restriction -
10,730 gallons of coating per rolling, 12-month period

Applicable Compliance Method -
Compliance with the above annual coating usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.

Usage Restriction -
150 gallons of cleanup material per rolling, 12-month period

Applicable Compliance Method -
Compliance with the above annual cleanup material usage restriction shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and in the permits to operate for emissions units R002, R009, and R010.
2. USEPA Method 24 or 24A shall be used to determine the OC content for all coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. 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 limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and 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:

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 4.41
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 2,005
 MAGLC (ug/m3): 4,476

Pollutant: Cyclohexane
 TLV (ug/m3): 1,032,600
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 8.28
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 3,724
 MAGLC (ug/m3): 24,586

Pollutant: Butanol
 TLV (ug/m3): 151,570
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 7.58
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 3,437
 MAGLC (ug/m3): 3,609

Pollutant: Methyl ethyl ketone
 TLV (ug/m3): 589,770
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 11.22
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 5,049
 MAGLC (ug/m3): 14,042

Pollutant: Butyl acetate
 TLV (ug/m3): 712,640
 Maximum Hourly Emission Rate per Emissions Unit (lbs/hr): 17.93
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 8,092
 MAGLC (ug/m3): 16,968

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table.
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.