

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.

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

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>
R002- Automated Paint Spray Booth 2	OAC rule 3745-31-05 (A)(3) 14-05689	Volatile Organic Compound (VOC) emissions from coatings shall not exceed 322.1 lbs/day, excluding cleanup. VOC emissions from cleanup shall not exceed 73.0 lbs/month. VOC emissions shall not exceed 59.18 tons per year (TPY), including cleanup. See terms and conditions A.2.b, A.2.c, and B.1. through B.3.
	OAC rule 3745-21-07(G)(2)	Exempt, per term B.3.

2. **Additional Terms and Conditions**
 - (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the specified mass emissions rate limitations, coating and cleanup material VOC content limitations, and usage limitations. The VOC content of each coating employed in this emissions unit shall not exceed 5.7 lbs/gallon, as applied. The VOC content of each cleaning material employed in this emissions unit shall not exceed 7.3 lbs/gallon, as applied.

B. Operational Restrictions

1. The maximum amount of coatings employed in this emissions unit shall not exceed 56.5 gallons/day and 20,611 gallons/year.
2. The maximum amount of cleanup materials employed in this emissions unit shall not exceed 10 gallons/month and 120 gallons/year.
3. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed, by type of coating and cleanup material.
 - b. The number of gallons of each coating and cleanup material employed, by type of coating and cleanup material.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon, by type of coating and cleanup material.
 - d. The total volatile organic compound emission rate for all coatings, in pounds per day, by type of coating (b x c).

e. The total combined volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.

f. 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).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall maintain monthly records of the VOC emissions and the material use from the coatings and cleanup materials for this emissions unit. The VOC emissions shall be summarized in tons per year at the end of each calendar year.
3. The permit to install for emissions unit R002 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: Butyl Acetate

TLV (ug/m3): 712,638

Total Maximum Hourly Emission Rate (lbs/hr): 0.54

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3): 0.3

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,968

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in term A.2.b and A.2.c). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks (i.e., photochemically reactive material restriction in term B.3). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 45 days of the occurrence.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing an exceedance of the coatings and/or inks or cleanup material usage limitations (i.e., usage limitations in term B.1 and B.2.) The reports shall include a calculation of the VOC emissions over the deviation period. The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services of the total VOC emissions and the total coating and cleanup material usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emissions Limitation:

322.1 lbs VOC/day from the application of coating material.

Applicable Compliance Method:

Compliance with the daily VOC emissions limitations shall be demonstrated by the recordkeeping requirement in term and condition C.1.

Emissions Limitation:

73.0 lbs VOC/month from the application of cleanup material.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation shall be demonstrated by the recordkeeping requirement in term and condition C.2.

Emissions Limitations:

59.18 TPY VOC from the application of coatings and cleanup material.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitations shall be demonstrated by a summation of the VOC emissions as recorded in term and condition C.2 for coatings and cleanup materials, divided by 2000 pounds, such that the summations equal Tons per Year (TPY) VOC emissions.

Emissions Limitations:

5.7 pounds of VOC per gallon of coating, as applied, and
7.3 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 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.
2. Compliance with the coating usage limitations in term and condition B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.
3. Compliance with the cleanup material usage limitations in term and condition B.2 shall be demonstrated by the record keeping in term and condition C.2.
4. Compliance with the material usage limitation in term and condition B.3 shall be demonstrated by the record keeping in term and condition C.1.

F. Miscellaneous Requirements

1. None