

Facility ID: 1409090278 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: 1409090278 Emissions Unit ID: K001 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>
K001 - Electrodeposition Paint System - Misc. Metal Parts Coating Line	OAC rule 3745-31-05(A)(3) (PTI 14-05499)	Volatile Organic Compound (VOC) emissions shall not exceed 49 pounds per hour.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1) (i) and OAC rule 3745-31-05(C). Volatile Organic Compound (VOC) emissions shall not exceed 30 tons per year based upon a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(1)(i)	See terms A.2.b. and B.1. 3.0 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents.

2. **Additional Terms and Conditions**
 - (a) The hourly emission limitation outlined in term A.1. for VOC is based upon the emissions unit Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Electrodeposition paint system) and K002 (Off-line spray booth) shall not exceed 9.9* TPY for any single HAP and 24.9* TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAP's emitted are the same as the amount of HAP's used, since all HAP's used evaporate.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the coating material VOC content, annual coating usage limitation and emission limitations.

B. Operational Restrictions

1. The maximum amount of all materials added to the electrodeposition tank, excluding water and exempt solvents, shall not exceed 20,000 gallons per year, based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for all materials employed in this emissions unit:
 - a. The name and identification number of each material added to the electrodeposition tank.
 - b. The VOC content (excluding water and exempt solvents) in pounds per gallon for each material added to the electrodeposition tank.
 - c. The number of gallons (excluding water and exempt solvents) of each material added to the electrodeposition tank.
 - d. The rolling, 12-month summation of all materials added to the electrodeposition tank.

- e. The VOC emissions, in pounds or tons (b x c).
 - f. The rolling, 12-month summation of the VOC emissions, in pounds or tons
2. The permittee shall collect and record the following information each month for K001 and K002 as follows:
- a. The name and identification number of each coating, employed.
 - b. The individual Hazardous Air Pollutant (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 [sum all the individual HAP contents from (b)].
 - 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 [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
 - k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding eleven calendar months.
 - l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding eleven calendar months.

* 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 individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

3. The permit to install for this emissions unit K001 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: Butoxy Ethanol (CAS 111-76-02)
 TLV (ug/m3): 96,700
 Maximum Hourly Emission Rate (lbs/hr): 10
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 443
 MAGLC (ug/m3): 2302

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where 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 Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation reports which identify any exceedance of the material usage limitations set forth in term B.1.

If no exceedances occurred, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.b.

If no exceedances occurred, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements of the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that specify the individual HAP emissions from the facility, the combined HAPs emissions from the facility, and the total VOC emissions from this emissions unit. The reports shall be submitted by April 15th of each year to the Hamilton County Department of Environmental Services. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:
49 lbs/hour VOC

Applicable Compliance Method:
The hourly limit is determined by multiplying the maximum coating usage rate in the electrodeposition tank of 16.2 gals/hr by the VOC content of the coating materials of 3.0 lbs VOC/gal.
 - b. Emission Limitation:
30 TPY VOC based upon a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section C.1.
 - c. Emission Limitation:
3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1.

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant to 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
 - d. Emission Limitation:
Coating materials added to the electrodeposition tank, excluding water and exempt solvents, shall not exceed 20,000 gallons per year as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section C.1.
2. Compliance with the HAP emission limits from K001 and K002 specified in term A.2.b shall be demonstrated by the recordkeeping in term C.2. Formulation data shall be used to determine the HAP contents of the coating and cleanup materials.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D and E.