Facility ID: 1413000327 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: 1413000327 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
spray booth for Teflon coating application	OAC rule 3745-31-05(A)(3) (PTI 14-04963)	104 lbs of organic compound (OC)/day*, for coatings only 9.3 tons per year (TPY) of OC, including cleanup materials See term and condition A.2.b, A.2.c and B.1 below. * The daily emission limitation specified above is based upon the emission unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit.
	OAC rule 3745-31-05(D)	See term and condition A.2.a below.
	OAC rule 3745-21-07(G)(2)	Exempt, see term and condition B.2 below.

2. **Additional Terms and Conditions**

   (a) The actual usage 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 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 is (are) the same as the amount of HAP(s) used since all HAP(s) used evaporated.
   The OC content, as applied, of each coating employed in this emissions unit shall not exceed 8.67 pounds of OC per gallon of coating, including water and exempt solvents.
   The OC content of each cleanup material employed in this emissions unit shall not exceed 6.8 pounds of OC per gallon of cleanup material.

B. **Operational Restrictions**

1. The maximum annual coating and cleanup material usages for this emissions unit shall not exceed 2,100 gallons per year for coatings and 60 gallons per year for cleanup materials.

2. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:

   a. the company identification for each coating and cleanup material employed;

   b. the number of gallons of each coating employed, including water and exempt solvents;

   c. the number of gallons of each cleanup material employed;

   d. the OC content of each coating, as applied, in pounds per gallon, including water and exempt solvents;

   e. the OC content of each cleanup material, in pounds per gallon;

f. the total OC emissions for all the coatings and cleanup materials, in tons [summation of {[(b x d) for each coating] + [(c x e) for each cleanup material]}/2000]; and

g. a record of each coating and cleanup material employed in this emissions unit, indicating whether or not the liquid organic material in each coating and/or cleanup material is photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

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 HAPs 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 HAPs 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 (and divided by 2,000 lbs/ton if the units are in tons)];

j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material (and divided by 2,000 lbs/ton if the units are in tons)];
k. the updated rolling, 12-month summation of usage for each individual HAP emissions**, in tons (this shall include the information for the current month and the preceding eleven calendar months); and

l. the updated rolling, 12-month summation of usage for total combined HAPs emissions**, in tons (this shall include the information for the current month and the preceding 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 is (are) the same as the amount of HAP(s) used since all HAP(s) used evaporated.

3. The permittee shall calculate and record the following information for each calendar year:

a. the total OC emissions, in tons (summation of C.1.f for the calendar year);

b. the total amount of coating material employed, in gallons, including water and exempt solvents (summation of C.1.b for the calendar year); and

c. the total amount of cleanup material employed, in gallons (summation of C.1.c for the calendar year).

4. The permit to install for this emissions unit 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. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each toxic 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:

Pollutant: Trichloroethylene

TLV (ug/m3): 269,000

Maximum Hourly Emission Rate (lbs/hr): 7.7

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 812

MAGLC (ug/m3): 6,405

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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxics 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 Toxics Policy" will be satisfied with the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect and record the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxics 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 Toxics 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 Toxics 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 any use of noncomplying coatings or cleanup materials (i.e., for OC contents and use of photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month HAP emission limitations of 9.9 tons and 24.9 tons for any single HAP and combination of HAPs respectively, for the entire facility.

   All quarterly deviation reports shall be submitted in accordance with Part A.1.c of the General Terms and Conditions.

3. The permittee shall submit annual reports that summarize the annual coating and cleanup material usages, OC emissions, and individual HAP and combined HAPs emissions (including calculations) for the calendar year. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. **Testing Requirements**

1. Formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings and cleanup materials.

2. Compliance with the daily OC emission limitation, annual OC emission limitation, OC content limitations, HAP emission limitations, and material usage restrictions shall be determined as follows:

   a. Emission Limitation: 104 lbs of OC/day, for coatings only

   Applicable Compliance Method: Compliance has been demonstrated by multiplying the maximum hourly material (coating) usage rate, in pounds, including water and exempt solvents, by the maximum operating schedule of 24 hrs/day and by the maximum OC content (8.67 lbs of OC/gallon for coatings, including water and exempt solvents).

   b. OC Emission Limitation: 9.3 TPY of OC, including cleanup material

   Applicable Compliance Method: Compliance with the annnual OC emission limitation is ensured if compliance is maintained with the OC content and material usage limitations.

   c. OC Content Limitations: 8.67 lbs of OC/gallon for coatings; 6.8 lbs of OC/gallon for cleanup materials

   Applicable Compliance Method: Compliance with the OC content limitations for coatings and cleanup materials shall be determined by the record keeping requirements specified in Section C.1.
   d. HAP Emission Limitations: 9.9 TPY for any single HAP; 24.9 TPY for any combination of HAPs

   Applicable Compliance Method: Compliance with the annual HAP emission limitations shall be determined by the record keeping requirements specified in Section C.2.

   e. Material Usage Limitations: 2,100 gallons/year for coatings; 60 gallons/year for cleanup materials

   Applicable Compliance Method: Compliance with the material usage limitations for coatings and cleanup materials shall be determined by the record keeping requirements specified in Section C.3.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A.1., A.2.a through A.2c, B.1, B.2, C.1, C.2, C.3, D.1 through D.3, E.1 and E.2.