

Facility ID: 1413000402 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: 1413000402 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>
drive through paint booth # 1	OAC rule 3745-31-05(A)(3) (PTI 14-04822)	89.8 lbs/day of volatile organic compound (VOC) emissions, including VOC emissions from cleanup materials
		3.86 tons per year (TPY) of VOC emissions, including VOC emissions from cleanup materials*
	OAC rule 3745-31-05(D)	See Section A.2 below. 3.86 TPY of VOC emissions, including VOC emissions from cleanup materials*
	OAC rule 3745-21-09(U)(2)(f)	* Emission limitation is based on a rolling, 12-month summation. See Section A.2.a below.

2. Additional Terms and Conditions

- (a) Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI #14-04822, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09. The total allowable 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 HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.
The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 6.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.
The VOC content of each cleanup material employed in this emissions unit shall not exceed 5.8 pounds of VOC per gallon of cleanup material.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usages for this emissions unit shall not exceed 765 gallons per year for coatings and 500 gallons per year for cleanup materials, based upon a rolling, 12-month summation of the coating and cleanup material usage figures.
2. The maximum daily coating and cleanup material usages for this emissions unit shall not exceed 9.65 gallons per day for coatings and 5 gallons per day for cleanup materials.

C. Monitoring and/or Record Keeping Requirements

1. 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 [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 (and divided by 2,000 lbs/ton if the units are in tons)];
 - j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [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 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 the permit, this shall be a cumulative total for all months since the issuance of the PTI.); and
 - l. the updated rolling, 12-month summation of usage 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 the permit, 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 Ohio EPA field office or local air agency 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.

- 2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed, excluding water and exempt solvents;
 - c. the VOC content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents;
 - d. the name and identification of each cleanup material employed;
 - e. the volume, in gallons, of each cleanup material employed;
 - f. the VOC content of each cleanup material, in pounds per gallon;
 - g. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day [the summation of (b x c) for all coatings, plus (e x f) for all cleanup materials]; and
 - h. the total number of gallons of all coatings employed (summation of (b) for all coatings) and the total number of gallons of all cleanup materials employed (summation of (e) for all cleanup materials).
- 3. The permittee shall maintain monthly records of the following information:
 - a. the total number of gallons of all coatings employed;
 - b. the total number of gallons of all cleanup materials employed;
 - c. the updated rolling, 12-month summation of all coatings employed, in gallons;
 - d. the updated rolling, 12-month summation of all cleanup materials employed, in gallons;
 - e. the total VOC emissions for the calendar month (summation of C.2.g for each day of the calendar month); and
 - f. the updated rolling, 12-month summation of the total VOC emission rate for all coatings and cleanup materials employed, in tons.
- 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 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 Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: isopropyl alcohol
 TLV (ug/m3): 983,000
 Maximum Hourly Emission Rate (lbs/hr): 23.52
 Predicted 1-Hour Maximum Ground-Level Concentration
 (ug/m3): 16,484
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,333

Pollutant: toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 4.0
 Predicted 1-Hour Maximum Ground-Level Concentration
 (ug/m3): 2,715
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,476

Pollutant: diethylene triamine
 TLV (ug/m3): 4,200
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration
 (ug/m3): 62.8
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 100

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, record, and retain 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. when the 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 daily record showing the use of noncomplying coatings or cleanup materials or exceedances of the coating and/or cleanup material usage limits. 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.

All quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the annual coating and cleanup material usages, VOC emissions and HAP emissions for the calendar year. The reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the VOC emission limitations, VOC content limitations, HAP emission limitations and material usage restrictions shall be determined by the following methods:
 - a. VOC Emission Limitations: 89.8 lbs of VOC/day, including cleanup materials; 3.86 TPY of VOC, including cleanup materials

Applicable Compliance Method: Compliance with the daily VOC emission limitation shall be determined by the record keeping specified in Section C.2. Compliance with the annual VOC emission limitation is ensured if compliance is maintained with the VOC content limitations and annual material usage restrictions for the coatings and cleanup materials.
 - b. VOC Content Limitations: 6.3 pounds of VOC/gallon, excluding water and exempt solvents, for coatings; 7.1 pounds of VOC/gallon for cleanup materials

Applicable Compliance Method: Compliance with the VOC content limitation for coatings shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC content of the coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of any cleanup material.

c. HAP Emission Limitations: 9.9 TPY for any single HAP; 24.9 TPY for any combination of HAPs

Applicable Compliance Method: Compliance with the HAP emission limitations shall be determined by the record keeping requirements specified in Section C.1.

d. Material Usage Restrictions: 12 gallons/day, and 1,000 gallons/year for coatings, based upon a rolling, 12-month summation; 2 gallons/day, and 200 gallons/year for cleanup materials, based upon a rolling, 12-month summation

Applicable Compliance Method: Compliance with the daily material usage restrictions shall be determined by the record keeping specified in Section C.2. Compliance with the annual material usage restrictions shall be determined by the record keeping specified in Section C.3.

F. **Miscellaneous Requirements**

1. None