

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.

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit K004](#)

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Facility ID: 1413000402 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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 - Drive through paint booth # 1 | OAC rule 3745-31-05(A)(3) PTI 14-04822 | Volatile Organic Compounds (VOC) emissions shall not exceed 89.8 pounds per day, including cleanup. See terms A.2.a, A.2.c and A.2.d. See section B.2. |
| | OAC rule 3745-31-05(C) | The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile Organic Compounds (VOC) emissions shall not exceed 3.86 tons per year including cleanup, based on a rolling, 12-month summation. See terms A.2.b, A.2.c and A.2.d. See section B.1. |
| | OAC rule 3745-21-09(U)(2)(f) | The emission limitations pursuant to this rule is equally stringent to the emission limitations based on OAC rule 3745-31-05(A)(3). See terms A.2.c, A.2.d and A.2.e. See section B.1. |

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limits for all coatings and cleanup materials, usage limitations and compliance with the Air Toxics Policy. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003 and K004 including all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to be installed air contaminant sources, combined, 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. The volatile organic compound (VOC) content, as applied of each coating employed in this emissions unit shall not exceed 6.3 pounds of volatile organic compounds per gallon of coating, excluding water and exempt solvents. The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 5.8 pounds per gallon of cleanup material. The director has determined that best available technology for the emissions unit, as required by rule 3745-31-05 of the Administrative Code, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of this rule.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 765 gallons per year for coatings and 500 gallons per year for cleanup materials, based upon rolling, 12-month summations of the coating and cleanup material usage figures. The permittee has existing records to demonstrate compliance with these limits upon the issuance of the permit.
2. The maximum daily coating and cleanup material usage for emissions unit K001 shall not exceed 9.65 gallons per day of 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 emissions units identified in term A.2.b:
 - a. The name and identification number of each coating, as 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 and 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 [the 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 for individual HAP emissions** for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. The updated rolling, 12-month summation for total combined HAP emissions**, in pounds or 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 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 emissions unit K001:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - 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 organic compound emission rate for all coatings and cleanup materials employed, in pounds per day $[(b \times c) + (e \times f)]$.
3. The permittee shall maintain monthly records of the following information:
 - a. The coating and cleanup material usage for each month;
 - b. The updated rolling, 12-month summation of the coating and cleanup material usage figures.
 - c. The updated rolling, 12-month summation of the VOC emissions.
4. The permit to install for this emissions unit [K001] was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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
 MAGLC (ug/m3): 23,404

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 4.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2715
 MAGLC (ug/m3): 4476

Pollutant: Diethylene triamine
 TLV (ug/m3): 4200
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 62.8
 MAGLC (ug/m3): 100

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 30 of each year.
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 usage limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
 - b. The total combined HAP usage limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or rolling, 12-month coating and cleanup material usage limitations. The report shall also include any exceedances of the coating and cleanup material VOC content limitations. If no exceedances occurred during the reporting period then a report is required stating so.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials employed in emissions unit K001. 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 ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the annual usage limitations cited in section B.1 shall be demonstrated by the record keeping in sections C.2 and C.3.
3. Compliance with the VOC content limitations cited in terms A.2.c and A.2.d shall be demonstrated by the record keeping in section C.2.
4. Compliance with daily VOC emission limitation and the daily coating and cleanup material usage limitation shall be determined by the recordkeeping requirements in section C.2.
5. Compliance with the HAP limitation cited in term A.2.b shall be determined by the recordkeeping requirements in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A, B, C.1-C.3, D and E.

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Facility ID: 1413000402 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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> |
|---|---|---|
| K002 - Drive through paint booth # 2 | OAC rule 3745-31-05(A)(3) PTI 14-04822 | Volatile Organic Compounds (VOC) emissions shall not exceed 89.8 pounds per day, including cleanup. See terms A.2.a, A.2.c and A.2.d. See section B.2. |
| | OAC rule 3745-31-05(C) | The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) Volatile Organic Compounds (VOC) emissions shall not exceed 3.86 tons per year including cleanup, based on a rolling, 12-month summation. See terms A.2.b, A.2.c and A.2.d. |
| | OAC rule 3745-21-09(U)(2)(f) | See section B.1. The emissions limitations pursuant to this rule is equally stringent to the emissions limitations based on OAC rule 3745-31-05(A)(3). See terms A.2.c, A.2.d and A.2.e. See section B.1. |

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limits for all coatings and cleanup materials, usage limitations and compliance with the Air Toxics Policy. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003 and K004 including all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to be installed air contaminant sources, combined, 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. The volatile organic compound (VOC) content, as applied of each coating employed in this emissions unit shall not exceed 6.3 pounds of volatile organic compounds per gallon of coating, excluding water and exempt solvents. The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 5.8 pounds per gallon of cleanup material. The director has determined that best available technology for the emissions unit, as required by rule 3745-31-05 of the Administrative Code, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of this rule.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 765 gallons per year for coatings and 500 gallons per year for cleanup materials, based upon rolling, 12-month summations of the coating and cleanup material usage figures. The permittee has existing records to demonstrate compliance with these limits upon the issuance of the permit.
2. The maximum daily coating and cleanup material usage for emissions unit K002 shall not exceed 9.65 gallons per day of 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 emissions units identified in term A.2.b:
 - a. The name and identification number of each coating, as 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 and 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 [the 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 for individual HAP emissions** for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. The updated rolling, 12-month summation for total combined HAP emissions**, in pounds or 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 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 emissions unit K002:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - 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 organic compound emission rate for all coatings and cleanup materials employed, in pounds per day [(b x c) + (e x f)].
3. The permittee shall maintain monthly records of the following information:
 - a. The coating and cleanup material usage for each month;
 - b. The updated rolling, 12-month summation of the coating and cleanup material usage figures.
 - c. The updated rolling, 12-month summation of the VOC emissions.
4. The permit to install for this emissions unit [K002] was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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
 MAGLC (ug/m3): 23,404

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 4.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2715

MAGLC (ug/m3): 4476

Pollutant: Diethylene triamine
TLV (ug/m3): 4200
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 62.8
MAGLC (ug/m3): 100

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from emissions unit K002 for the previous calendar year. These reports shall be submitted by January 30 of each year.
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 usage limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
 - b. The total combined HAP usage limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or rolling, 12-month coating and cleanup material usage limitations. The report shall also include any exceedances of the coating and cleanup material VOC content limitations. If no exceedances occurred during the reporting period then a report is required stating so.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials employed in emissions unit K002. 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 ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the annual usage limitations cited in section B.1 shall be demonstrated by the record keeping in sections C.2 and C.3.
3. Compliance with the VOC content limitations cited in terms A.2.c and A.2.d shall be demonstrated by the record keeping in section C.2.
4. Compliance with daily VOC emission limitation and the daily coating and cleanup material usage limitation shall be determined by the recordkeeping requirements in section C.2.
5. Compliance with the HAP limitation cited in term A.2.b shall be determined by the recordkeeping requirements in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A, B, C.1-C.3, D and E.

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Facility ID: 1413000402 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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> |
|--|--------------------------------------|--|
| K003 - Miscellaneous Metal Parts Paint Spray Booth | OAC rule 3745-31-05(A)(3) 14-04822 | Volatile Organic Compounds (VOC) emissions shall not exceed 33.1 pounds per day, including cleanup. See terms A.2.a, A.2.c and A.2.d. See sections B.2 and B.3. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile Organic Compounds (VOC) emissions shall not exceed 1.97 tons per year including cleanup, based on a rolling, 12-month summation. See term A.2.b, A.2.c and A.2.d. See section B.1. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| | OAC rule 3745-31-05(C) | Volatile Organic Compounds (VOC) emissions shall not exceed 1.97 tons per year including cleanup, based on a rolling, 12-month summation. See term A.2.b, A.2.c and A.2.d. See section B.1. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| | OAC rule 3745-21-09(U)(2)(e)(ii) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limits for all coatings and cleanup materials, usage limitations and compliance with the Air Toxics Policy. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003 and K004 including all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit pursuant to OAC rule 3745-31-03 currently, and future to be installed air contaminant sources, combined, 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.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.
The volatile organic compound (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 usage for this emissions unit shall not exceed 250 gallons per year of coatings and 400 gallons per year of cleanup materials, based upon a rolling, 12-month summation of the coating and cleanup material usage figures.
2. The maximum daily coating usage for this emissions unit shall not exceed 2.49 gallons per day.
3. The maximum daily cleanup material usage for emissions unit K003 shall not exceed 3 gallons per day.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b:
 - a. The name and identification number of each coating, as 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 and 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 [the 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 for individual HAP emissions** for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. The updated rolling, 12-month summation for total combined HAP emissions**, in pounds or 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 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 emissions unit K003:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - 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 organic compound emission rate for all coatings and cleanup materials employed, in pounds per day [(b x c) + (e x f)].
 - 3. The permittee shall maintain monthly records of the following information:
 - a. The coating and cleanup material usage for each month;
 - b. The updated rolling, 12-month summation of the coating and cleanup material usage figures.
 - c. The updated rolling, 12-month summation of the VOC.

- 4. The permit to install for this emissions unit [K003] was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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
 MAGLC (ug/m3): 23,404

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 4.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2715
 MAGLC (ug/m3): 4476

Pollutant: Diethylene triamine
 TLV (ug/m3): 4200
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 62.8
 MAGLC (ug/m3): 100

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from emissions unit K003 for the previous calendar year. These reports shall be submitted by January 30 of each year.
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 usage limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
 - b. The total combined HAP usage limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or rolling, 12-month coating and cleanup material usage limitations. The report shall also include any exceedances of the coating and cleanup material VOC content limitations. If no exceedances occurred during the reporting period then a report is required stating so.
4. The permittee shall notify the director (the appropriate Ohio EPA District Officer or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating or cleanup material usage limit. 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 45 days after the exceedance occurs.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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 ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the annual usage limits cited in section B.1 shall be demonstrated by the record keeping in sections C.2 and C.3.
3. Compliance with the VOC content limitations cited in terms A.2.c and A.2.d shall be demonstrated by the record keeping in section C.2.
4. Compliance with daily VOC emission limitation and the daily coating and cleanup material usage limitation shall be determined by the recordkeeping requirements in section C.2.
5. Compliance with the HAP limitation cited in term A.2.b shall be determined by the recordkeeping requirements in section C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A, B, C.1-C.3, D and E.

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

Facility ID: 1413000402 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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> |
|---|--|--|
| (K004) - Drive through paint spray booth #4 | OAC rule 3745-31-05(A)(3) 14-05910 | <p>Volatile Organic Compounds (VOC) emissions shall not exceed 17.5 pounds per hour from coating usage alone and 33.02 tons per year from coatings and cleanup materials.</p> <p>See terms and conditions A.2.a, A.2.b and A.2.c.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(C).</p> <p>See term A.2.d. See term A.2.e.</p> <p>See sections B.1 and B.2.</p> |
| | OAC rule 3745-21-09(U)(1)(c) OAC rule 3745-31-05(C) | |

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage and emissions limitations.
 The hourly emission limitations outlined in term A.1 are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limitations.
 The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.17 pounds of VOC per gallon of cleanup material, as applied.
 The VOC content of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
 The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003 and K004 including all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to be installed air contaminant sources, combined, 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.

B. Operational Restrictions

1. The maximum annual coating usage from the emissions unit K004 shall not exceed 12,480 gallons, excluding water and exempt solvents.
2. The maximum annual cleanup material usage from the emissions unit K004 shall not exceed 3120 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.e:
 - 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 number 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 [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
 - k. the updated rolling, 12-month summation of usage for each individual HAP**, 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 the total combined HAPs**, 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 line-by-line basis.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
 - c. the volume, in gallons, excluding water and exempt solvents, of each coating employed;
 - d. the name and identification number of each cleanup material employed;
 - e. the VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material excluding water and exempt solvents;
 - f. the volume, in gallons, excluding water and exempt solvents, of each cleanup material employed; and
 - g. the total VOC emissions for all coatings and cleanup materials employed, in pounds per month $[(b \times c) + (e \times f)]$.

[Note: The definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permit to install for emissions unit K004 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 and supplemental information after submittal of 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 SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 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: Hexamethylene Di-isocyanate
 TLV (ug/m3): 34
 Maximum Hourly Emission Rate (lbs/hr): 0.023 (emissions unit K004)
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.80
 MAGLC (ug/m3): 0.82

Physical changes to or in the method of operation of the emissions unit after it's 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 it's 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 of any exceedance of the HAP emission limitations outlined in term and condition A.2.e. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each

year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and or cleanup materials (i.e., the VOC content limitations in terms A.2.c and A.2.d). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports on the usage of coatings and cleanup materials, in gallons in the emissions unit K004 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit annual reports which specify the total VOC emissions from emissions unit K004 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitations:
Volatile organic compound emissions shall not exceed 17.5 pounds per hour from coatings alone and 33.02 tons per year from coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be determined by using following equations:

 - a. pounds per hour of VOC emissions from coatings alone = $A \times B$; where:

A = VOC content of the coatings as applied in pounds per gallon, excluding water and exempt solvents (3.5 pounds of VOC per gallon of coatings, excluding water and exempt solvents); and

B = maximum hourly usage of coatings in gallons per hour (5 gallons per hour).
 - b. tons per year of VOC emissions from coatings and cleanups = $(A \times B + C \times D) \times (E)$; where:

A = VOC content of the coatings as applied in pounds per gallon, excluding water and exempt solvents (3.5 pounds of VOC per gallon of coatings, excluding water and exempt solvents);

B = maximum annual usage of coatings in gallons (12,480 gallons);

C = VOC content of the cleanup materials in pounds per gallon, as applied (7.17 pounds of VOC per gallon of cleanup materials, as applied);

D = maximum annual usage of cleanup materials in gallons per day (3120 gallons); and

E = conversion factor of 1/2000 ton per pound.

None

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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 ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the HAP usage limitations specified in term and condition A.2.e shall be determined by the required record keeping in section C.1.
3. Compliance with the coating and cleanup material usage limitations as specified in sections B.1 and B.2 shall be determined by the required record keeping in section C.2.

F. Miscellaneous Requirements

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