

Facility ID: 1413000502 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: 1413000502 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-Miscellaneous Metal Parts Painting Operations	OAC rule 3745-31-02(A) PTI 14-05942 OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.a.  The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

- (a) Permit to Install 14-05942 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for VOC emissions:
  - i. the maximum annual coating usage for this emissions unit shall not exceed 4,100 gallons per year, excluding water and exempt solvents;
  - ii. the maximum annual cleanup solvent use shall not exceed 250 gallons per year; and
  - iii. the maximum VOC content of solvent used for cleanup shall not exceed 7.3 pounds of VOC per gallon of solvent.

**B. Operational Restrictions**

1. None

**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 name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information annually for the purpose of determining annual VOC emissions:
  - a. the name and identification of each solvent used for cleanup;
  - b. the VOC content of each solvent used for cleanup, in pounds per gallon;
  - c. the number of gallons of each solvent used for cleanup;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed; and
  - e. the total VOC emissions from all coatings and cleanup solvents employed, in tons, using the calculation methods provided in section E.2 and replacing the voluntary restriction amounts with the actual amounts as recorded in sections C.1 and C.2.
3. 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: xylene  
 TLV (ug/m3): 434,192  
 Maximum Hourly Emission Rate (lbs/hr): 1.06  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2609  
 MAGLC (ug/m3): 10,338

4. 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 notify the Hamilton County Department of Environmental Services in writing of any monthly record showing a coating VOC content greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. 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 in which the use of noncomplying coatings was recorded.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant 40 CFR Part 60, Appendix A, an owner or operator 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

b. Emission Limitation:

Voluntary restrictions which maintain the VOC emissions to less than 10 tons per year.

Applicable Compliance Method:

The annual VOC emissions voluntary restriction established through OAC rule 3745-31-02(A) was developed from the following equations using the information submitted by the permittee in PTI Application 14-05942, submitted on April 30, 2007:

4,100 gal coatings excluding water and exempt solvents/yr x 3.5 lbs VOC/gal coating excluding water and exempt solvents x 1 Ton/2000 lbs = 7.18 TPY VOC from surface coating

250 gal cleanup solvent/yr x 7.3 lbs VOC/gal cleanup solvent x 1 Ton/2000 lbs = 0.91 TPY VOC from cleanup operations

Total VOC emissions considering voluntary restrictions = 8.09 TPY

**F. Miscellaneous Requirements**

1. None